

1 UNITED STATES DISTRICT COURT  
2 FOR THE DISTRICT OF NEW JERSEY

3  
4 **IN RE: VALSARTAN PRODUCTS**  
5 **LIABILITY LITIGATION**

**CIVIL ACTION NUMBER:**

**19-md-02875-RBK-KMW**

6 **STATUS CONFERENCE**  
7 **VIA REMOTE ZOOM**  
8 **VIDEOCONFERENCE**

9 Mitchell H. Cohen Building & U.S. Courthouse  
10 4th & Cooper Streets  
11 Camden, New Jersey 08101  
12 April 7, 2021  
13 Commencing at 2:00 p.m.

14 **B E F O R E:**

**SPECIAL MASTER THE HONORABLE**  
**THOMAS I. VANASKIE**

15 **A P P E A R A N C E S:**

16 MAZIE SLATER KATZ & FREEMAN, LLC  
17 BY: ADAM M. SLATER, ESQUIRE  
18 103 Eisenhower Parkway  
19 Roseland, New Jersey 07068  
20 For the Plaintiffs

21 GOLOMB & HONIK, P.C.  
22 BY: RUBEN HONIK, ESQUIRE  
23 1835 Market Street, Suite 2900  
24 Philadelphia, Pennsylvania 19103  
25 For the Plaintiffs

KANNER & WHITELEY, LLC  
BY: LAYNE HILTON, ESQUIRE  
701 Camp Street  
New Orleans, Louisiana 70130  
For the Plaintiffs

Camille Pedano, Official Court Reporter  
camillepedano@gmail.com  
609-774-1494

Proceedings recorded by mechanical stenography; transcript  
produced by computer-aided transcription.

**A P P E A R A N C E S (Continued) :**

GOLDENBERG LAW, LLC  
BY: MARLENE J. GOLDENBERG, ESQUIRE  
800 Lasalle Avenue, Suite 2150  
Minneapolis, Minnesota 55402  
For the Plaintiffs

KIRTLAND & PACKARD LLP  
BY: BEHRAM V. PAREKH, ESQUIRE  
1638 South Pacific Coast Highway  
Redondo Beach, California 90277  
For the Plaintiffs

SLACK & DAVIS, LLP  
BY: JOHN RANDOLPH DAVIS, ESQUIRE  
2705 Bee Cove Road, Suite 220  
Austin, Texas 78746  
For the Plaintiffs

DUANE MORRIS, LLP  
BY: SETH A. GOLDBERG  
JESSICA PRISELAC, ESQUIRE  
30 South 17th Street  
Philadelphia, Pennsylvania 19103  
For the Defendants, Prinston Pharmaceuticals,  
Solco Healthcare U.S. LLC, and  
Zhejiang Huahai Pharmaceuticals Ltd.

PIETRAGALLO GORDON ALFANO BOSICK & RASPANTI, LLP  
BY: CLEM TRISCHLER, ESQUIRE  
FRANK H. STOY, ESQUIRE  
One Oxford Centre, 38th Floor  
Pittsburgh, Pennsylvania 15219  
For the Defendant, Mylan Pharmaceuticals Inc.

GREENBERG TRAURIG, LLP  
BY: VICTORIA DAVIS LOCKARD, ESQUIRE  
3333 Piedmont Road, NE, Suite 2500  
Atlanta, Georgia 30305  
For the Defendants, Teva Pharmaceutical Industries Ltd.,  
Teva Pharmaceuticals USA, Inc., Actavis LLC,  
and Actavis Pharma, Inc.

CIPRIANI & WERNER, P.C.  
BY: JESSICA M. HEINZ, ESQUIRE  
450 Sentry Parkway  
Blue Bell, Pennsylvania 19422  
For the Defendants, Aurolife Pharma LLC  
and Aurobindo Pharma USA, Inc.

**A P P E A R A N C E S (Continued) :**

HILL WALLACK, LLP  
BY: ERIC I. ABRAHAM, ESQUIRE  
NAKUL Y. SHAH, ESQUIRE  
21 Roszel Road  
Princeton, New Jersey 08540  
Attorney for Defendants, Hetero Drugs and Hetero Labs

**ALSO PRESENT:**

Loretta Smith, Esquire  
Judicial Law Clerk to The Honorable Robert B. Kugler  
  
Larry MacStravic, Courtroom Deputy

1 (PROCEEDINGS held via remote Zoom videoconference before  
2 Special Master The Honorable Thomas I. Vanaskie at 2:00 p.m.)

3 JUDGE VANASKIE: All right. Let's get started. I  
4 scheduled this conference for a couple of explicit purposes  
5 that were mentioned in Special Master Order 14, one of which is  
6 to understand the discovery issues that are ripe for  
7 disposition for a decision at this point and to see if I can  
8 get a prioritization of those issues; and the other explicitly  
9 identified matter concerned the documents that have been  
10 withheld as nonresponsive to get some guidance in terms of how  
11 best to conduct my *in camera* review of the random sample of  
12 documents and to make sure that you're satisfied with the size  
13 of the sample.

14 And I know you've addressed a couple of other issues  
15 for me, and I did want to talk about the translation issue as  
16 well, the translation of English documents into Mandarin.

17 So those are the issues that we're going to address  
18 today, as well as any other issues you'd like to bring up. And  
19 I think I'd like to start with the translation of the documents  
20 from English to Mandarin when the witness being deposed does  
21 not speak English or is not sufficiently fluent in English to  
22 be able to understand the English document.

23 Now, I've received additional letter briefs on the  
24 issue. They're well presented. I have a couple of questions  
25 and I will start with the questions. And the first question I

1 have is, at least to ZHP, we're only talking about English  
2 documents to Mandarin at the present time, if ZHP is agreeable  
3 to machine translation of the documents at least for the  
4 purpose of presenting them in Mandarin to a witness, why  
5 shouldn't we go that route?

6 And so, Mr. Slater, I'll ask you that question first.

7 MR. ABRAHAM: Judge, may I ask a procedural question  
8 before we start?

9 JUDGE VANASKIE: Sure, Mr. Abraham.

10 MR. ABRAHAM: I represent Hetero Labs, as Your Honor  
11 recalls. It wasn't entirely clear to me if Your Honor expected  
12 Hetero Labs to participate in this call. So if Your Honor  
13 wants us, we'll stay; if Your Honor does not, we're happy to  
14 get about our business, but I want to defer to Your Honor.

15 JUDGE VANASKIE: Well, let me ask the plaintiffs. I  
16 don't personally think that it's necessary for Hetero to be on  
17 this call, but let's hear -- would it be Ms. Goldenberg who  
18 addresses it for the plaintiffs or who would address it?

19 MS. GOLDENBERG: No, Your Honor, it's not myself. I  
20 think it's probably Mr. Parekh, if he's here, and I'm not sure  
21 if he is on.

22 JUDGE VANASKIE: Is he here? Maybe that answers the  
23 question.

24 MR. SLATER: Your Honor, it's Adam Slater.

25 MR. PAREKH: I'm sorry, Your Honor.

1 JUDGE VANASKIE: Okay, there he is.

2 MR. SLATER: We had thought that this was one of the  
3 things you wanted to discuss. If you don't, you know, we can  
4 wait. We've laid out our position to Your Honor which is that  
5 we think we're in the red zone here at this point of real  
6 concern because the issue is just not ending. But I won't  
7 argue it further than that. It's up to you if you want to hear  
8 it or not today.

9 JUDGE VANASKIE: I'm sorry, I know you'd like to get  
10 it resolved but what I was intending to cover today I think was  
11 accurately captured by Mr. Goldberg, and that is that I was  
12 looking to get a prioritization of the matters that are ripe.  
13 I'm not sure that's ripe. It's not presented by way of a  
14 motion. I know you want to get it resolved, we have a  
15 conference call a week from today and I expect we'll address it  
16 at that time.

17 MR. SLATER: Perfect. Thank you.

18 JUDGE VANASKIE: I won't be going through the Hetero  
19 matter today.

20 MR. ABRAHAM: Okay. Thank you, Your Honor. I wish  
21 everybody well and I'll carry on without you. Thank you,  
22 Judge.

23 JUDGE VANASKIE: All right. Thank you.

24 All right. So, Mr. Slater, if the defense is  
25 agreeable, if ZHP is agreeable, to machine translation, why

1 shouldn't that be the standard here?

2 MR. SLATER: I think we stated in our letter that we  
3 would agree to that. I think we stated in our letter we would  
4 agree to it. And we did a lot of research on this and I think  
5 we suggested Google Translate is probably, you know -- that or  
6 Amazon, something of that nature. Obviously, there's other  
7 issues in terms of the scope, but in terms of if we're directed  
8 to translate anything, we agree that's the way to do it.

9 JUDGE VANASKIE: Okay. Mr. Goldberg?

10 MR. GOLDBERG: Your Honor, I think, as we suggested,  
11 machine translation to be used for documents during the  
12 depositions would be fine, subject to, you know, our reserving  
13 our right to object to the accuracy of the translation.

14 Now, what we're -- what our view is, is that we would  
15 be doing this in lieu of plaintiffs having taken the time to  
16 translate the documents in advance of the depositions so that  
17 we can facilitate the completion of the depositions as  
18 scheduled by the Court. But, we would -- we would definitely  
19 need to reserve the right to object to the accuracy of the  
20 document. Of course, the Court will rule on that kind of  
21 objection down the road and, you know, will make its  
22 determination as to whether that was a good objection or not;  
23 but we would be willing to go this route to facilitate the  
24 completion of the depositions.

25 JUDGE VANASKIE: All right. Here's what I'd like to

1 see happen. We can reduce it to an order, if necessary.

2 First, to the extent that there are documents that are  
3 both in English and in Mandarin, there should be some way to  
4 identify what those documents are; that is, there should be  
5 some cooperation or there should be some indication when the  
6 documents have been produced that they are in both languages so  
7 that when a Mandarin-speaking witness is being deposed, the  
8 plaintiff knows that that document exists in Mandarin and can  
9 use that Mandarin document when asking the witness a question  
10 and displaying it to the witness. So I'd ask that whatever  
11 steps need to be taken to achieve that result be taken so that  
12 there's -- you have that ability, that ability to know that you  
13 have the document in both languages.

14 If a document is in English only and the document is  
15 20 pages or less, then I expect that the document, in toto,  
16 will be translated, it can be done by machine translation; but  
17 this way the witness would have the opportunity to look at the  
18 entire document.

19 If it's --

20 MR. GOLDBERG: Your Honor.

21 JUDGE VANASKIE: Yes, go ahead, Mr. Goldberg.

22 MR. GOLDBERG: I'm sorry. I'm sorry to interrupt.

23 It just -- you know, I just realized that what  
24 plaintiff is suggesting is to use something called Google  
25 translation, which is different than machine translation, which



1 is what we had proposed and which is what I thought we were  
2 talking about, which is a vendor that has a system that can  
3 translate the documents. Google translation, my understanding,  
4 is simply using Google, which we all can do to translate a  
5 document, and I'd be very concerned about the accuracy --

6 MR. SLATER: Somebody has their phone off mute.  
7 Somebody is talking with their phone open.

8 JUDGE VANASKIE: Right.

9 UNIDENTIFIED SPEAKER: Jessica Heinz is not on mute.  
10 She is now.

11 MS. HEINZ: I was thinking.

12 JUDGE VANASKIE: Okay.

13 MR. GOLDBERG: So I want to correct what I said  
14 because we would not be agreeable to a simple Google  
15 translation because unless we can compare the accuracy of that  
16 to the accuracy of a proprietary software that's used by a  
17 vendor to do what's called machine translation, but we never  
18 suggested that it would be good enough to simply use Google to  
19 translate a document, especially a document of this highly  
20 technical nature.

21 JUDGE VANASKIE: All right. Mr. Slater --

22 MR. GOLDBERG: We provided -- Your Honor, we provided  
23 for the Court the information about the machine translation  
24 based on a proprietary software implemented by a vendor, and  
25 Your Honor can see in our submission the cost is pennies for

1 even large documents. And so that was -- that was the basis  
2 for our suggestion about machine translation.

3 JUDGE VANASKIE: All right. Mr. Slater.

4 MR. SLATER: Yes, Your Honor, I'll start and hand off  
5 to Mr. Parekh.

6 We spoke to our vendor and -- in terms of the vendor  
7 handling all of our ESI, and it turned out from that discussion  
8 that using their system would actually have been worse because  
9 the way it would have come out, it would have been formatted  
10 completely differently and almost impossible to follow in any  
11 kind of a reasonable fashion.

12 I'm not sure -- there's other issues that are being  
13 raised but I'm not sure what proprietary software Mr.  
14 Goldberg's talking about. As Your Honor -- you understand, if  
15 they've been translating these documents to Mandarin already,  
16 they might as well just produce them. But I'm going to hand  
17 off to Mr. Parekh who wants to also provide more technical  
18 information in response to specifically what Mr. Goldberg may  
19 be talking about.

20 JUDGE VANASKIE: Before I hear from Mr. Parekh, I'd  
21 like to ask Mr. Goldberg a question, and that is: Your letter  
22 did not, as I recall, identify any particular vendors, it just  
23 gave us a cost estimate. Is that correct?

24 MR. GOLDBERG: That's correct, Your Honor.

25 JUDGE VANASKIE: All right. Okay. Mr. Parekh.

1 MR. PAREKH: Good morning -- or good afternoon, Your  
2 Honor.

3 So we have talked to multiple vendors and particularly  
4 we've talked to our document review vendor where we're hosting  
5 all of these documents, and what they have told us is that the  
6 way they do machine translation is they take the extracted  
7 text, which is just the textual nature of the document that was  
8 produced, and then they translate that using their own  
9 proprietary system, which is run by Amazon. Most vendors use a  
10 back-end system that's either Amazon, Google, or something  
11 similar, and they then produce that translated text back in  
12 Mandarin.

13 The problem with using something like that is that the  
14 text is unformatted. So you have, essentially, a series of  
15 Chinese characters. Sometimes there's page breaks, sometimes  
16 there's not; it depends on how the underlying English text was  
17 extracted.

18 So when you give that to a witness, the witness is  
19 going to look at it and say, I don't know what this is, I don't  
20 know where it corresponds to the English document, and, you  
21 know, we're going to get an objection from Mr. Goldberg that  
22 says we object to using this document.

23 So what we did was we tried to find other systems  
24 where we could try and keep the formatting as intact as  
25 possible. And from our research, one of the best systems

1 around is Google Translate. They have a significant investment  
2 in AI and infrastructure in their translation systems and  
3 there's not -- you know, unless Mr. Goldberg has something  
4 specific that he would want us to use and that we can talk  
5 about, we think that Google Translate is a perfectly acceptable  
6 version of systems translation and currently appears to be  
7 close to state of the art in terms of translation of documents.

8 JUDGE VANASKIE: Mr. Parekh, how does the Google  
9 Translate work in terms of do you provide a scanned image of  
10 the document? I'm just trying to understand how it works.

11 MR. PAREKH: Sure. So most of our documents are in  
12 .pdf -- in searchable .pdf format, particularly the English  
13 language documents. So you upload the searchable .pdf version  
14 to Google Translate and it sends back a translated version  
15 after about a minute or so that you can then download. And  
16 that's the way it works. If it's a scanned image, those are  
17 much more difficult because then you have to OCR them and the  
18 whole entirety of the translation becomes unusable for the most  
19 part.

20 JUDGE VANASKIE: All right. Mr. Goldberg.

21 MR. GOLDBERG: Yes, Your Honor, a few things.

22 One, I think the -- the point about formatting is  
23 really a function -- it's really an issue of cost. So, yes,  
24 you can have the documents translated in just text and that's  
25 going to be a lower cost than if you also ask your vendor to

1 format the documents. I think what plaintiffs are suggesting  
2 is they don't want to incur the cost of not only having the  
3 language translated but the document -- the translated document  
4 formatted to appear like the original English document. And,  
5 you know, that's an example of plaintiffs not wanting to have  
6 skin in the game. These are their documents that they want to  
7 use in a deposition. Out of fairness to the witness, they  
8 should be translated to Chinese, and they are saying, Judge,  
9 we're willing to do a machine translation but we're not willing  
10 to pay for the translation.

11 So in our view, what plaintiffs should be doing is  
12 translating the document, using their vendor, we're okay with  
13 them using their vendor that has the data already to translate  
14 the document, and to have the document formatted.

15 In terms of the Google Translate, I can't speak to the  
16 accuracy of it. We would certainly want to understand that,  
17 but it also seems to raise some questions about security. I  
18 don't know that we can have restricted confidential documents  
19 that have been produced in this case uploaded to Google  
20 Translate for purposes of translation without understanding  
21 what kind of security issues there are.

22 JUDGE VANASKIE: Mr. Parekh, can you address the  
23 security concerns?

24 MR. PAREKH: Sure. So the security concern is  
25 definitely an issue, we understand that as well, which is why

1 we've been trying to find another vendor that uses something  
2 similar to Google Translate. But with our vendor, what we know  
3 is that they are only capable of doing the machine translation  
4 from the extracted text. If you wanted to format the document  
5 in a way that mimics the original document, that has to be done  
6 manually. That can't be done simply from the extracted text.

7 So when Mr. Goldberg talks about incurring extra  
8 costs, we're not talking about machine translation anymore;  
9 we're talking about manual translation in order to get the  
10 document formatted correctly.

11 If Your Honor wishes, I can show Your Honor what a  
12 Google Translate of a document looks like through screen  
13 sharing and Your Honor can understand what we're looking at  
14 when Mr. Goldberg talks about machine translation.

15 JUDGE VANASKIE: Well, I'd like to see it but, you  
16 know, the security concern is overriding right now. You're  
17 certainly free to show me what it would -- I don't have any --  
18 I wouldn't have any problem with plaintiffs using Google  
19 Translate except for the security concern that was just raised  
20 by Mr. Goldberg. So --

21 MR. SLATER: Your Honor, can I just --

22 JUDGE VANASKIE: Yes, Mr. Slater.

23 MR. SLATER: Thank you.

24 I would think, and, you know, part of what we laid out  
25 in our briefs is to find out what they've already translated

1 because the more this discussion goes on, the more it sounds  
2 like they've been translating for their witnesses already. So  
3 there may be a whole trove of these documents that they already  
4 have and they're looking at us to duplicate the work, which  
5 would not be efficient.

6           The English documents we're talking about, the  
7 security concern, I think comes down to two -- there's two  
8 considerations: One, Your Honor has our motion which is  
9 pending to de-designate the over-designated documents, which I  
10 think can alleviate a lot of the problem with that; and two, a  
11 lot of the documents we're talking about, I would say the  
12 lion's share, we're talking about long English language  
13 regulatory documents as to which there could never be a  
14 reasonable argument as to confidentiality. So I think that  
15 it's very hard for them to make that argument that there's --  
16 that any of the documents that really would need to be  
17 translated, which we believe should be a very narrow subset,  
18 would create such a concern.

19           I suppose if there was a document that had that  
20 concern we could talk to the defense about it, but the manpower  
21 level that it would take to essentially reconstitute these  
22 documents, after doing the extracted text, you're talking about  
23 hours and hours and hours, pulling our entire Chinese language  
24 review team that's reviewing documents to prep us for  
25 depositions off of what we need them to do for us and putting

1 them into this side project, which we don't think would make  
2 good use of their time.

3 JUDGE VANASKIE: Well, here's what I'm going to do  
4 because -- no, I think I've heard enough, Mr. Goldberg, on this  
5 particular issue. Documents that have not been designated as  
6 confidential you can use Google Docs to translate those  
7 documents. I don't -- you've preserved your objection, Mr.  
8 Goldberg, with respect to the accuracy of the translation,  
9 you've reserved that objection even if they used a specific  
10 vendor, what you're calling machine translation. To me, this  
11 is the same as machine translation. You don't have to go out  
12 to another vendor. I don't know what -- if there's any cost  
13 with Google Translate, maybe it's free. I've used Google  
14 Translate for some of the documents that were produced in this  
15 matter so I could get an understanding of what the documents  
16 were saying, to some extent, when I only had a foreign language  
17 involved in it. And you've preserved your objection with  
18 respect to the accuracy of the translation.

19 Now, those documents that have been designated as  
20 confidential, I expect that there's going to have to be a  
21 discussion or an effort at you all to get together to figure  
22 out how best to accomplish that. Perhaps now I will expedite a  
23 ruling because I wanted to get a priority list of what I need  
24 to decide, and I'll put at the top of the priority list the  
25 confidentiality designations that have been made in this case



1 so you can get a decision from me in a timely manner on that.

2 But machine translation is acceptable. It may be that  
3 Google is state of the art, and I'm perfectly comfortable with  
4 saying you can use Google Translate and you can preserve your  
5 objections on the defense side. And this way at least we get  
6 beyond where we are right now, where the witness is being asked  
7 questions about documents in English without being able to see  
8 them.

9 Now, with respect to the translation, I was starting  
10 to say that any document 20 pages or less I expect the entire  
11 document to be translated so the witness can look at it for  
12 context and see the entire document; and any document that is  
13 more than 20 pages I expect there to be available to the  
14 witness the ten pages before and the ten pages after. I  
15 understand that's arbitrary but it's better than nothing, and  
16 it gives at least some context when the question is being  
17 asked.

18 And so that's what I expect to happen with respect to  
19 these depositions that will be going forward.

20 Anything else on this issue?

21 MR. SLATER: Yes, Your Honor. It's Adam Slater, for  
22 the record.

23 We raised a couple concerns in our brief, which one of  
24 them we appreciate you addressed right up front, which is that  
25 if they already have a translation of the document in the

1 production, they should tell us. So I wanted to ask for  
2 clarification on that and raise a second issue, which is, does  
3 that include if they have a translation of a document they  
4 haven't produced to us, so they're not putting us through these  
5 hoops when they're sitting with it as well. I would think that  
6 would be -- if the concern is the witness having the  
7 translation in front of him or her, then that would seem to be  
8 reasonable as well.

9 JUDGE VANASKIE: Yes, that sounds reasonable to me.  
10 Let's hear from Mr. Goldberg, though.

11 MR. GOLDBERG: Your Honor, my understanding is we have  
12 produced all of the documents that are -- documents that have  
13 been translated have been produced, and we've -- we represented  
14 to that effect in our brief but we're representing it to Your  
15 Honor again so that's not an issue.

16 JUDGE VANASKIE: Okay.

17 MR. SLATER: Okay. The second issue, Your Honor, is,  
18 we had identified certain categories of documents that we were  
19 asking Your Honor to consider that we wouldn't have the  
20 translation obligation, and there's really three categories:  
21 One is English documents that were sent to or from or in the  
22 custodial file of the witness him or herself. The second  
23 category was their operative corporate documents that they  
24 would have needed to be able to work with in the ordinary  
25 course, which we argued if they haven't translated those then

1 it was never needed anyway and they'll have to explain how they  
2 worked with them or whatever they need to explain, but those  
3 are documents that if they only exist in English, that's how  
4 the company chose to do business. And the third was the  
5 official FDA communications and related documents which, from  
6 our perspective, we cited a regulation or a statute to Your  
7 Honor, that's the language they're in so that's how they work  
8 legally.

9           And I wanted to just make sure that I explained one  
10 concern, which Your Honor can possibly take care of right now  
11 on the record, which is, Your Honor well knows if we try this  
12 case, the witness is going to be up on a screen and the  
13 document's going to be up and we want to be able to make sure  
14 that if the operative document's in English, for a jury sitting  
15 in Camden, that they're going to be able to see the English  
16 document on the screen with the witness even if we're using the  
17 Chinese language document for the convenience of the witness.  
18 Because what we're often doing is we're identifying both  
19 versions, if there are two versions, and I'm saying I'm working  
20 off the English but we'll work with the Chinese version, the  
21 Mandarin version for the convenience of the witness. So we  
22 just want to make sure at the end we're not whipsawed and told,  
23 well, sorry, you know, you were using a translation or you used  
24 the Chinese version so you can't show the jury the English  
25 version when you're questioning the witness on it.

1           So I threw a lot at you, I'm sorry, but I know you got  
2 it, but those are three areas of concern I wanted to make sure  
3 that we could hopefully address.

4           JUDGE VANASKIE: All right. Mr. Goldberg.

5           MR. GOLDBERG: Your Honor, I'll take the last one  
6 first, which is the trial issue.

7           It seems premature to be making a ruling pertaining to  
8 trial at this juncture, and it's likely that Your Honor may not  
9 be presiding over that trial so we don't see how a ruling could  
10 be made today about what would happen at a trial somewhere down  
11 the line, especially on an important issue like this. It'll  
12 have to be resolved by the trial judge.

13          MR. SLATER: Well, I think --

14          JUDGE VANASKIE: Let me interrupt you, I'm sorry, Mr.  
15 Goldberg, but it seems to me that what Mr. Slater is asking is  
16 that he not be prejudiced at the time of trial by saying that  
17 only the Mandarin language document can be displayed to the  
18 jury as opposed to the English -- the document in English.

19          Did I understand you correctly, Mr. Slater?

20          MR. SLATER: You did. And, obviously, the conduct at  
21 these depositions is very important in terms of how it will  
22 roll out at trial. So, yes, that's exactly my concern. We  
23 don't want to be prejudiced by that.

24          JUDGE VANASKIE: Well, I don't see -- you know, I  
25 guess from my perspective, you could not be prejudiced. In

1 other words, as long as they're faithful translations, the fact  
2 that the witness is now looking at a document that's different  
3 than -- different as in appearance because it's in a different  
4 language from what the witness is seeing should not prejudice  
5 you.

6 MR. SLATER: Well, what I'm talking about is where we  
7 have, for example, an English language document that is a ZHP  
8 corporate document and we're questioning on that document, for  
9 example, but we're having to use a machine translation of part  
10 of it to show the witness, we're going to be working off the  
11 English document. The machine translation or the Mandarin  
12 version of the document, if there's two separate versions,  
13 which happens quite often, we're using that for the convenience  
14 of the witness so that they can see something in their own  
15 language at this point. But the document we want that is the  
16 evidential document that we're going to want to show on the  
17 screen when the witness is being questioned is the English  
18 version which the jury can actually read while they listen to  
19 the testimony. So as long as we have protection on that in the  
20 record, I just wanted to raise it because I want to make sure  
21 that we're not, as you understand, whipsawed when we get to  
22 trial.

23 JUDGE VANASKIE: Well, you've raised the issue and I  
24 think -- so you've made a record on it.

25 Go ahead, Mr. Goldberg.

1 MR. GOLDBERG: Well, I was going to say, Your Honor, I  
2 think Mr. Slater has made -- has raised his issue. I don't  
3 think this is an issue that can be resolved today or decided  
4 today. As Mr. Slater just said, this is an evidentiary issue  
5 and I think this is an issue that will have to be decided by  
6 the trial judge.

7 I think what's clear is that Mr. Slater isn't  
8 prejudiced from raising this issue with the trial judge at the  
9 appropriate time.

10 MR. SLATER: Well, that's small solace because the  
11 defense is asking to require us to use Mandarin language  
12 documents in questioning the witness. And if we're making a  
13 record right now on videos that are of witnesses who are not  
14 going to come to the trial, then, you know, but for these  
15 rulings, we would be using the English version on every single  
16 one of these because that's what the jury's going to see on the  
17 screen. So that's why I've been placing in the record I'm  
18 working off the English version but there's also a Mandarin  
19 version so we have that flexibility. But as long as we have on  
20 the record the defense is not asking us to do this with the  
21 intent of later foreclosing us from using the English versions  
22 at trial, that would be a reasonable thing to put --

23 MR. GOLDBERG: No.

24 MR. SLATER: -- on the record so there's no more  
25 concern.

1 MR. GOLDBERG: No. I mean, this is an issue of  
2 fairness to the witness; this isn't an issue of convenience.  
3 The witness can't answer questions about a document the witness  
4 can't read. That's what we're trying to decide today. And the  
5 issue about what you would show a jury is an issue for a later  
6 date. Presumably when the witness is on the stand at trial,  
7 they're going to need to be shown a document they can read,  
8 which will be a Mandarin or a Chinese document.

9 MR. SLATER: Your Honor --

10 MR. GOLDBERG: How you address it with the jury is an  
11 issue to be decided by the trial judge.

12 MR. SLATER: I think you get the issue, Your Honor. I  
13 don't think Mr. Goldberg's grasping what I'm saying. I'm not  
14 saying that pejoratively. I'm not talking about a live witness  
15 in the courtroom. I'm talking about when we use these videos  
16 and designate portions and play them as substantive testimony  
17 at trial. So it's very concerning that this entire exercise is  
18 going down and defense counsel won't just say, of course, we  
19 agree at trial you can use the document in the language that is  
20 spoken by the jury, if it exists, because that will be -- that  
21 would be more convenient and make more sense. But for them not  
22 to agree to that makes me think this entire exercise could  
23 potentially prejudice us in a very significant way at trial for  
24 the convenience of the witnesses that they chose to designate.  
25 That would be inequitable.

1 JUDGE VANASKIE: Well, I think the best way to handle  
2 this right now is you can have available that document that's  
3 in the English language and have a translation that's available  
4 for the convenience of the witness, but you can ask your  
5 interpreter to work off the English document in asking the  
6 question. But when you ask a witness to review something, the  
7 witness should be able to have the document in the witness's  
8 language.

9 MR. SLATER: That's a great solution. That's why I  
10 asked you for help, Judge.

11 JUDGE VANASKIE: Okay. All right. Now, you've raised  
12 three issues. The FDA documents.

13 The FDA documents, when you're examining a witness  
14 with respect to the FDA documents, should be translated. I  
15 know that there's the regulation that they're submitted in  
16 English and, yes, the witnesses who have been designated should  
17 have an understanding about what that required document says  
18 but it's still in a foreign language, as far as the witness is  
19 concerned. And so as to the FDA documents, there should be a  
20 translation available for the witness to see the document in  
21 the witness's native language.

22 You raised an issue with respect to documents like  
23 emails that the witness -- that are in the witness's custodial  
24 file that are in English, presumably the witness should  
25 understand that document, I understand that; but, again, it's



1 not in the witness's native language, it should be translated.

2 And the third issue I think you raised were contracts  
3 or other documents that exist in English, again, I guess in  
4 that witness's custodial file, maybe. Correct me if I'm wrong  
5 on that category of documents.

6 MR. SLATER: It could be one or the other.

7 JUDGE VANASKIE: Yes.

8 MR. SLATER: For example, there could be an important  
9 agreement that was provided to that witness in English only in  
10 the ordinary course and the witness has it or it could be a  
11 central document that comes within the topic the witness was  
12 designated to talk about and the operative document is only in  
13 English.

14 JUDGE VANASKIE: Again, I think it should be provided  
15 in the witness's native language. You certainly have the right  
16 to inquire whether the witness worked with the document in  
17 English, you can ask a question, you've been designated to  
18 speak on this document that was found in your file in English,  
19 and try to get an understanding of the witness's familiarity  
20 with English; but, ultimately, it should be available in the  
21 witness's native language.

22 MR. SLATER: Understood, Your Honor. Thank you for  
23 addressing those issues.

24 JUDGE VANASKIE: All right. Anything else on this  
25 issue, on the translation issue?

1 (No response.)

2 JUDGE VANASKIE: All right. Thank you.

3 MR. SLATER: I don't think so.

4 MR. GOLDBERG: Nothing from ZHP.

5 JUDGE VANASKIE: Thank you, Mr. Goldberg.

6 Now, the next item I wanted to talk about is this  
7 priority list of outstanding issues. And, Mr. Slater, you teed  
8 up the confidentiality designations and that's ripe for  
9 decision. I'm not asking for argument today on it. I just  
10 want to -- I just want you to tell me what I should address  
11 first from each of your perspectives.

12 So I take it you think that should be addressed first.

13 MR. SLATER: I think it's -- I mean, everybody's going  
14 to want to fight to the top of the list to get their issue to  
15 the top. I certainly think that it's pressing because it could  
16 solve a lot of the concerns and it will make it a lot easier  
17 for us, for example, to submit things to Your Honor without  
18 having to hold documents off the docket and send separate  
19 versions, et cetera.

20 JUDGE VANASKIE: Okay. I guess I should turn to you,  
21 Mr. Goldberg, at this time and say, what's on the top of your  
22 priority list?

23 MR. GOLDBERG: Your Honor, I don't -- I don't think  
24 that -- well, from the ZHP parties' standpoint, I don't think  
25 there are disputes that we view as any particular priority. We

1 don't -- you know, plaintiffs have raised a few issues but the  
2 only issue that we understand that's ripe for the Court at this  
3 point is, with respect to ZHP, is the confidentiality issue.

4 JUDGE VANASKIE: We also have the Chinese state  
5 secrets law issue, I think, with respect to ZHP.

6 MR. GOLDBERG: Right, Your Honor. And that issue has  
7 been -- in our view, we've narrowed that issue to the point of  
8 now being ready to have it be briefed by way of a motion to  
9 compel, if plaintiffs feel that a motion is warranted as to any  
10 of the documents on our state secret log. But as Your Honor  
11 can see through the various correspondence that we provided,  
12 this issue started with 300 or so documents on state secret  
13 logs. We've worked diligently with Chinese counsel to narrow  
14 that to about 90 documents. We then narrowed it even further  
15 before our on-the-record meet and confer down to about 35  
16 documents. We had that meet and confer. We discussed every  
17 document. We followed up that meet and confer and provided Mr.  
18 Slater and plaintiffs with information about the duplicates  
19 among the 90. And when you control for those duplicates, you  
20 control for documents that plaintiffs conceded during the meet  
21 and confer they're not challenging, you get to a universe of I  
22 think it's about 28 documents that are in dispute, and it's our  
23 understanding that we're at the point where plaintiffs would  
24 need to move to compel any of those documents.

25 JUDGE VANASKIE: Mr. Slater.

1 MR. SLATER: Thank you, Your Honor.

2 It's -- we're a little disappointed because of the way  
3 that the meet and confer ended, and I'm going to, if I could,  
4 indulge me for one second, the -- ZHP provided you the  
5 transcript, so you have the transcript.

6 JUDGE VANASKIE: Right.

7 MR. SLATER: And at the very end, on Page 128, we had  
8 gone through all the documents and, in going through the last  
9 document, asked the attorney who was based in China and had  
10 this discussion with us about the China state secret documents  
11 from China to the U.S. by Zoom, and I asked her about a  
12 document that had both factual information that ZHP had and  
13 some Chinese government impressions, and I said, on Line 11 on  
14 Page 128:

15 "The factual information could be provided and the  
16 local government viewpoints could be redacted, right?"

17 And Ms. Yang said: "Yes, I think that's one way to do  
18 it."

19 And then I said, I'm hopeful you all can go back, I'm  
20 paraphrasing, and consider doing that because that may  
21 alleviate the issue. If we can see what ZHP's factual  
22 information was, we're not really concerned about what the  
23 Chinese government thought so much about it, it's more about  
24 their factual information.

25 And Mr. Goldberg finished on Page 129, Line 4, and

1 said: "We'll consider it."

2 So when I said we're disappointed it was because their  
3 response to the Court was we considered it in January. We gave  
4 you what you get, we're not considering that any further. So  
5 that was a bit of a surprise to us because we would hope that  
6 before we have to get to the point of doing all this briefing  
7 that perhaps they could agree to do what they said they could  
8 do in the transcript and which they did with three documents  
9 that they already produced to us redacted.

10 So I was hoping we'd come out of this hearing with a  
11 reasonable midpoint, which is that they would redact the  
12 documents, take out all the Chinese government impressions,  
13 opinions, statements, leave in the factual information that ZHP  
14 put in, let us see that; we may, at that point, be done.

15 JUDGE VANASKIE: All right. Mr. Goldberg?

16 MR. GOLDBERG: Your Honor, I think that what the  
17 record reflects is a very cooperative and very diligent process  
18 down to 28 documents and we did consider it, we have  
19 communicated with our Chinese counsel, and we have a dispute as  
20 to these 28 documents.

21 We dispute what Mr. Slater refers to as factual  
22 information as being information that can be produced in this  
23 case, and we have discussed that with our Chinese counsel. And  
24 at this point, if plaintiffs feel that there are any documents  
25 they think warrant a motion, we're at the point for them to

1 file that.

2 JUDGE VANASKIE: All right. I guess that's where  
3 we're at then, Mr. Slater.

4 MR. SLATER: Okay.

5 JUDGE VANASKIE: File the motion. If it turns out  
6 that these 28 documents were largely subject to production  
7 because they're factual in nature and could have been produced  
8 with redactions, well, then you can ask for appropriate  
9 sanctions. But right now there's nothing I can do until I have  
10 a motion in front of me and make a decision about the scope of  
11 the Chinese state secret law and whether these documents, in  
12 their entirety, fall within that law.

13 MR. SLATER: Thank you.

14 MR. GOLDBERG: Your Honor, Your Honor, I just want to  
15 express a concern about the statement Your Honor just made  
16 regarding sanctions because we have Chinese counsel who are  
17 reviewing these documents and they are making their  
18 determinations based on their understanding of Chinese law.  
19 And Mr. Slater represented to Your Honor a few weeks ago that  
20 he has not retained a Chinese lawyer, he has not conferred  
21 about these issues with Chinese counsel, and he is making  
22 assertions based on his view of what the Chinese law requires.  
23 And I am -- it is concerning to me that what the Chinese  
24 lawyers are saying is being given short shrift. They are the  
25 ones -- they're the only lawyers in this case who have the

1 ability to opine on what Chinese law says and we are being  
2 guided by their understanding of Chinese law.

3 And so the assertion by Mr. Slater that documents can  
4 simply be redacted, well, we -- we did redact certain documents  
5 and we have reviewed the other documents and determined that  
6 they shouldn't be redacted based on advice of Chinese counsel  
7 pursuant to the -- the precedent set in the *Aerospatiale* case  
8 and what the Supreme Court indicates should be done. And to  
9 have a suggestion that there would be sanctions is concerning  
10 because we have done everything we can by the book to get this  
11 to the most narrow set of documents. And we're talking about  
12 28 of almost 400,000.

13 JUDGE VANASKIE: Well, no one's giving short shrift to  
14 the opinion of Chinese counsel and certainly it will be taken  
15 into consideration. It may be that I make a recommendation to  
16 Judge Kugler that I have the ability to consult an expert in  
17 Chinese law for purposes of making an independent judgment with  
18 respect to the Chinese state secret law. Certainly, while no  
19 one is giving short shrift to their opinion, it doesn't have to  
20 necessarily be taken as gospel, and there's plenty of case law  
21 that has recognized that on questions of foreign law, the Court  
22 can consider the opinion of somebody who is neutral and an  
23 expert in that particular jurisdiction's law.

24 All I'm saying is that I don't want there to have been  
25 withholding of information without a good-faith basis. I know

1 you haven't in this case, Mr. Goldberg, but you are relying  
2 upon your Chinese experts, your experts in Chinese law, and we  
3 all know that there can be differing opinions among experts,  
4 especially on matters like this.

5 Nobody's suggesting sanctions will be ordered but we  
6 are letting you know that this is a serious matter, just as the  
7 entire case is.

8 MR. SLATER: Your Honor, it's Adam Slater.

9 In the hope that, again, I can cut to the chase with  
10 this, I just want to make it clear for the record, when I read  
11 from the transcript on Page 128, Line 11 to 15, I was reading  
12 my discussion with the Chinese counsel --

13 JUDGE VANASKIE: I understand that. I understand  
14 that.

15 MR. SLATER: -- who said -- who said that's one way to  
16 do it. So he's telling us you can't do it when she said,  
17 during the meet and confer, yes, it can be done. So that's --  
18 you get where our consternation is is that we're going to go  
19 through all this briefing for nothing.

20 JUDGE VANASKIE: I didn't understand that. And I'm  
21 going to interrupt you because I did not understand Mr.  
22 Goldberg as saying that it cannot be done. I'm saying that  
23 they've looked at it and they've made a determination that as  
24 to these documents, these 28 documents --

25 MR. SLATER: No, she said it as in the documents that



1 we met and conferred on. I was in the context of a particular  
2 document and asked, that can be done. And then I said, can you  
3 go back, please, and see if you can do that now because that's  
4 the way to narrow and alleviate the dispute.

5 JUDGE VANASKIE: Sure. Well, I'd love to see the  
6 dispute go away. And unless and until it does, and Mr.  
7 Goldberg can go back to his experts and ask them again, is  
8 there any redactions that can be made, if they can't be made,  
9 then you're going to have to file your motion to compel.

10 MR. SLATER: Thank you, Your Honor.

11 JUDGE VANASKIE: Mr. Goldberg, I didn't mean to  
12 interrupt you.

13 MR. GOLDBERG: Your Honor didn't interrupt. I'm  
14 sorry. You know, I would say that -- you know, and one of the  
15 reasons we provided the transcript is Your Honor is more than  
16 welcome to review it and what you'll see is that not only was  
17 there a very meaningful dialogue about each of these documents  
18 with Chinese counsel, but that even among the 28 that have been  
19 disputed, the dispute is not a good one. The documents have no  
20 or very marginal connection to this case. And to the extent  
21 plaintiffs want to bring a motion that's frivolous about those  
22 documents, we would expect there to be the same understanding  
23 about costs.

24 JUDGE VANASKIE: Certainly there's always that  
25 understanding. Nobody means to preclude that.

1 All right. I'd like to get to the Mylan documents,  
2 the documents that have been withheld as nonresponsive. And  
3 what I was hoping to get is some guidance from you all with  
4 respect to what I should be looking for, for purposes of  
5 determining whether a document is potentially responsive or not  
6 responsive. And what I was hoping I could do is give you all a  
7 brief description of some of the documents that are in that  
8 random sample of documents sent to me, describe the document  
9 for you and have you give me an explanation as to why, on the  
10 plaintiffs' perspective, you'd view that document as  
11 responsive, and why, on the defense perspective, you'd view  
12 that document as nonresponsive, because what I have to do is go  
13 through those documents and make a determination responsive or  
14 not responsive for purposes of then saying, you know, 95  
15 percent of the documents have been appropriately categorized as  
16 not responsive, no need for further review, or give you my  
17 conclusions and then let you argue about whether or not they  
18 would warrant further review.

19 Before we get into that, first, is it all right if we  
20 proceed in this manner? We're not talking about privileged  
21 documents right now. We're talking about documents withheld as  
22 not relevant. So is there any problem?

23 Is it you, Mr. Trischler, who will be talking about  
24 this?

25 MR. TRISCHLER: Good afternoon, Your Honor.

1 JUDGE VANASKIE: Good afternoon.

2 MR. TRISCHLER: I will be talking about parts of it.  
3 I think if Your Honor gets into specific questions about the  
4 sampling documents, the random sampling of 300-plus documents,  
5 my colleague, Frank Stoy, is on the line who's probably more  
6 familiar with the particular documents than I. So if the Court  
7 has questions about particular documents, I may defer to Mr.  
8 Stoy; but if there are overarching issues with respect to the  
9 Court's observations, I can certainly address those.

10 JUDGE VANASKIE: All right. Mr. Honik, are you  
11 comfortable with proceeding in this manner?

12 MR. HONIK: I am, Your Honor. Like Mr. Trischler, Mr.  
13 Davis, who's on the Zoom, and Ms. Hilton have worked very  
14 closely on the Mylan team and they may have some more thorough  
15 responses than myself as we go through.

16 JUDGE VANASKIE: Now, Mr. Stoy pointed out that the  
17 documents I asked to be pulled, based upon using a random  
18 number generator, were a few documents short of the sample size  
19 I said I would use. Is that a problem from the plaintiffs'  
20 perspective?

21 MR. HONIK: Your Honor, that's like how many needles  
22 can you fit on the tip of a pin. I'm not sure what the answer  
23 is. So --

24 JUDGE VANASKIE: Mr. Stoy, how many documents was I  
25 short?

1 MR. STOY: Good afternoon, Your Honor.

2 JUDGE VANASKIE: Good afternoon.

3 MR. STOY: I believe you had stated in your order or  
4 on the record that you wanted to sample 352 documents and it  
5 ended up as 347, which actually made it into the order, so  
6 you're five short.

7 JUDGE VANASKIE: Okay. All right. If the plaintiffs  
8 want, I'll designate another five documents for random  
9 sampling.

10 MR. HONIK: Your Honor, I think we're okay for now.

11 JUDGE VANASKIE: Okay.

12 MR. HONIK: I'm also prepared to discuss kind of a  
13 larger reframe of how to do this because, obviously, this is  
14 not only about Mylan and not only about the 4,000 documents.  
15 But for now I think the number sampled is adequate.

16 JUDGE VANASKIE: All right. Very well. Thank you.

17 So I'm going to describe a document, I'll identify it  
18 by its Bates number because they're not in any necessary --  
19 they're not in any particular order, but the first document I'm  
20 going to look at has the Bates Number, after MDL2875, has  
21 00830263.

22 Now, this document has as a title, and the document is  
23 six pages long, has as a title Mylan Initial Risk Assessment  
24 for GxP Computerized System. The document is a form. There's  
25 no information on the form. I don't know what GxP stands for,

1 I don't know that it has anything to do with this particular  
2 matter, and, as I said, it's a form with checkmarks.

3 So, for example, the one question in the document on  
4 the first page is: Does the system support manufacturing,  
5 analysis, distribution, pharmacovigilance, documentation  
6 management, train records or other GxP-related activities? So  
7 as I said, it's a risk assessment for a computerized system.

8 Mr. Stoy, do you have any familiarity with this  
9 document or can you tell us what it is for?

10 MR. STOY: Your Honor, I pulled up the document so I'm  
11 actually looking at it.

12 JUDGE VANASKIE: Okay.

13 MR. STOY: It looks to me that this is a document that  
14 is related to a standard operating procedure and it's basically  
15 a blank template form that would be populated with information  
16 about a given system or a given product or something of that  
17 nature. So it would be used in the course of business with  
18 respect to specific products or processes, but the document  
19 itself that we're looking at doesn't actually contain any  
20 information.

21 JUDGE VANASKIE: Exactly.

22 MR. STOY: So I think we would take the position that  
23 because there's no information here that this document was  
24 properly coded and it's not responsive.

25 JUDGE VANASKIE: Now, I know, Mr. Honik and Mr. Davis,

1 that you don't have the document in front of you, but based  
2 upon the brief description I provided, how would you argue that  
3 this is a responsive document?

4 MR. HONIK: Your Honor, let me take a stab at it and  
5 then I'll invite Mr. Davis to supplement anything I may say.

6 To state the obvious, the manner in which Mylan  
7 performed risk assessment in manufacturing valsartan and API  
8 valsartan is central to this case. And so if there exists a  
9 standard operating procedure in which they had a format by  
10 which that assessment could occur, that is to say, you take the  
11 form and you answer the risk assessment questions on it,  
12 whether it was applicable or not applicable to valsartan, if it  
13 existed at the company as a way in which one could assess risk  
14 associated with the fabrication of this product, it's relevant  
15 and it's responsive. We should have the right to put that  
16 document in front of, for example, their QA people and say,  
17 this is a risk assessment protocol that was in your standard  
18 operating procedure. Did you employ it in evaluating the risks  
19 associated with valsartan? For that reason alone it strikes  
20 us, and me, that it's completely relevant and germane and we  
21 should have it so that we can question witnesses about its use.

22 JUDGE VANASKIE: All right. Anything else on this,  
23 Mr. Stoy?

24 MR. STOY: I mean, Your Honor, I would just add that  
25 this isn't the standard operating procedure itself. It's just,

1 as you can see because you're looking at the document, it's a  
2 checklist.

3 JUDGE VANASKIE: It's a checklist, yes.

4 MR. STOY: Correct. It's not populated with  
5 information so it wouldn't tell the plaintiffs anything about  
6 what Mylan did or did not do with respect to valsartan.

7 MR. HONIK: But it would allow us to question a  
8 witness and say, did you employ this risk criteria in the  
9 course of fabricating valsartan? That's the very -- that's the  
10 very point I was trying to make, Your Honor. Whether it's  
11 populated or not, if that's an operating procedure that they  
12 use to evaluate risk, should not we be able to put it in front  
13 of a Mylan witness and say, how, if at all, did you use this  
14 with valsartan?

15 MR. TRISCHLER: Well, Your Honor, Your Honor --

16 JUDGE VANASKIE: Well, you really can't, Mr. Honik,  
17 because you don't have the document in front of you, but it  
18 looks to me it was a document that would have been used to  
19 evaluate computerized systems for purposes of conducting a risk  
20 assessment. So it's like you want to buy a system to do this,  
21 does the system have these capabilities. It didn't appear to  
22 have anything to do with manufacturing.

23 But did I interrupt you, Mr. Stoy?

24 MR. STOY: No, Your Honor.

25 MR. TRISCHLER: I think that was me about to chime in,

1 Clem Trischler.

2 JUDGE VANASKIE: Okay, Mr. Trischler. Sorry, I'm  
3 looking at the document so I'm not seeing you right now.

4 MR. TRISCHLER: No, that's fine. I'll hold back my  
5 comments for now.

6 JUDGE VANASKIE: Okay.

7 MR. DAVIS: Your Honor, this is John Davis. Could I  
8 trouble you for that Bates number again?

9 JUDGE VANASKIE: Yes, it's 00830263.

10 MS. HILTON: Your Honor, if I may, Layne Hilton on  
11 behalf of the plaintiffs.

12 This document actually is very demonstrative of a much  
13 larger issue, which is, some of the largest volume of these  
14 withheld documents are standard operating procedures and Mylan  
15 has, you know, I'm sure Mr. Stoy or Mr. Trischler will chime  
16 in, thousands of standard operating procedures but, you know,  
17 just yesterday or early this morning I observed some standard  
18 operating procedures that relate to the auditing of API  
19 suppliers that were withheld and looking at the file name, I  
20 would have had no understanding that it was about API because  
21 the standard operating procedures have sort of a unitized file  
22 name that doesn't give any identifying information. And so  
23 when plaintiffs engaged in a process of trying to pare down the  
24 20,000 withheld documents, we used some of these search -- you  
25 know, search terms in order to identify the universe of



1 standard operating procedures because we felt like those were  
2 somewhat benign documents that really shouldn't be withheld  
3 because if it's just a checklist, it's just a checklist. But  
4 not having that document actually does hinder and impair our  
5 ability to fully understand the email attachments.

6           So, you know, I'll just say that we -- a lot of the  
7 documents are actually going to be standard operating  
8 procedures and there was no way for plaintiffs to understand  
9 the context of that standard operating procedure because we  
10 were searching to try to identify the standard operating  
11 procedures as a group.

12           JUDGE VANASKIE: All right.

13           MR. DAVIS: Your Honor, to add to what Ms. Hilton is  
14 saying, you know, I've looked at the document and this is  
15 exactly one of those cases where an email was produced to us  
16 and, in fact, produced as a relevant, responsive document in  
17 this case, and the Bates number that you're referring to, Your  
18 Honor, is one of the attachments to that email. And so this  
19 gets to one of the difficulties that we've experienced quite a  
20 bit in this case is there's oftentimes documents that have  
21 emails or whatnot that have 20 attachments and 15 of them have  
22 been withheld, as an example, and it's very difficult to sort  
23 of get a wholistic understanding of what the document is  
24 talking about without having all of the documents. And that's  
25 -- that's standard, as part of my understanding, how this often

1 works is when any document or email, for example, is relevant,  
2 all the attachments should be produced. There shouldn't be  
3 this selective process of let's produce, you know, three of the  
4 attachments and withhold 17 of them. By definition, if the  
5 email is relevant, the attachment should be as well, and  
6 responsive.

7 JUDGE VANASKIE: Well, it seems to me that that issue  
8 can be handled by your request or a motion to compel the  
9 production of attachments, when you have a relevant email and  
10 you say, well, I didn't get the attachments. But, you know, I  
11 don't understand that these documents were withheld on the  
12 basis that they were an attachment to an email but were  
13 regarded as nonresponsive to your request.

14 So, Mr. Davis, I'm having a little trouble  
15 understanding that point you just made.

16 MR. STOY: Your Honor --

17 MR. DAVIS: If I can clarify.

18 JUDGE VANASKIE: Yes, Mr. Davis.

19 MR. DAVIS: Sure. If I can clarify, I looked up in  
20 our system the Bates number, which is why I asked Your Honor to  
21 repeat it, and it is an attachment to an email. The email has  
22 been produced by Mylan as a responsive document and, ergo, my  
23 argument is that we should get all the attachments as well.  
24 And, you know, that's typically how ESI protocols work in these  
25 kinds of litigations is -- and how it's just customary practice

1 and, in my opinion, just flat out -- if an email is responsive,  
2 all the attachments to that email should be responsive, too,  
3 because they provide the context of the document.

4 JUDGE VANASKIE: All right. Mr. Stoy.

5 MR. STOY: Yes, Your Honor.

6 MR. TRISCHLER: Your Honor, can I -- I'm sorry, Frank.  
7 I've been biting my tongue but if it came up --

8 MR. HONIK: If you are, Clem, we can't see it. You're  
9 in the shadows.

10 MR. TRISCHLER: I'm sorry. I'm sorry. I'll do the  
11 best I can to lighten things up for you, Ruben.

12 MR. HONIK: Thank you.

13 MR. TRISCHLER: Judge, this is the frustrating part  
14 and the difficult part about this issue because we start off  
15 with a very narrow -- I don't know if the judge is present and  
16 he can hear me.

17 JUDGE VANASKIE: Hold on, I had to let my dog out.  
18 Okay.

19 MR. TRISCHLER: Okay. I apologize for talking. It  
20 took me awhile to realize --

21 JUDGE VANASKIE: It's okay, I can listen while I let  
22 the dog out. Go ahead.

23 MR. TRISCHLER: I -- you know, we've gotten so far  
24 afield from the initial question that the Court asked, which  
25 is, what's the relevance of this blank form that has absolutely

1 no information on it into -- and that weaves into this broader  
2 discussion where what the plaintiffs are trying to do is to  
3 rewrite history and rewrite the protocols and agreements that  
4 were agreed to in this case.

5 Mr. Davis talks about the fact that, well, if an  
6 email's produced, then every single attachment ought to be  
7 produced. Well, you know what, Judge, there was an agreement  
8 that was entered in September, seven months ago, that said  
9 nonresponsive attachments to a responsive email do not have to  
10 be produced. That was the agreement so that the parties  
11 wouldn't have to waste time. It's a matter of proportionality.  
12 We've laid eyes on three million documents and spent millions  
13 and millions of dollars in ESI discovery and the documents that  
14 are at issue now have been reviewed and re-reviewed and now  
15 we're going to be asked to go back and review them a third  
16 time.

17 MR. DAVIS: Well, let me give -- I'm sorry.

18 JUDGE VANASKIE: Don't interrupt. Don't interrupt,  
19 Mr. Davis.

20 MR. TRISCHLER: The problem is that we had an  
21 agreement that you don't have to do it and that's what all  
22 these discovery disputes are about. That's why we can't get  
23 this litigation advanced. That's why we keep arguing the same  
24 things over and over again because we had an agreement in  
25 September that says the defendants are not going to be required

1 to produce nonresponsive attachments to emails and here Mr.  
2 Davis is saying, I want them all. If there's a responsive  
3 email, I want all the attachments. That's a problem, Judge.

4 I think what we ought to be looking at now is if we're  
5 going to advance the ball at all, the Court, the specific  
6 question, has already come up with a protocol and an order  
7 saying we're going to look at 352 documents, and we're going to  
8 make calls on responsiveness of those 352 documents; and then  
9 based on that, the Court, following argument or suggestions  
10 from counsel, will decide what else needs to be done. But to  
11 throw all that out now and to go back and say, forget the  
12 order, forget the ESI protocols -- if we were following the ESI  
13 protocols, we wouldn't even be here today. Because the ESI  
14 protocols say that when Mr. Honik sends his letter on Good  
15 Friday saying you've designated 10,000 documents that I think  
16 are responsive, under the court order, we have 30 days to  
17 review that and get back to him. Here we are three business  
18 days later raising these issues. We ought to stick to the  
19 orders of the Court so that the case can proceed and move  
20 forward or we'll be here six months from now arguing the exact  
21 same things, Your Honor.

22 MR. HONIK: Your Honor, may I --

23 MR. DAVIS: Your Honor, may I respond?

24 MR. HONIK: No, don't, please, Mr. Davis.

25 Your Honor, may I be heard first?

1 JUDGE VANASKIE: Certainly.

2 MR. HONIK: Your Honor, I know that Mr. Trischler  
3 earlier today said he didn't want to be found in error again  
4 today but, unfortunately, he is.

5 I was very disturbed when I got his letter to see that  
6 he spoke about a September agreement because, frankly, I was  
7 unfamiliar with it. And he specifically called out Mr. Parekh  
8 as having entered into that agreement with Mr. Ferretti. And I  
9 went back directly to Mr. Parekh and I went and checked the  
10 dockets and the so-called agreement that Mr. Trischler is  
11 referring to has nothing whatever to do with the subject that's  
12 now before you.

13 The agreement that was reached between Mr. Parekh and  
14 Mr. Ferretti, on behalf of ZHP, was narrow and singular and it  
15 was this: The question arose if there was a document that  
16 needed redaction, and the effect of the redaction was that the  
17 entire document had to be redacted so there was literally  
18 nothing to read, can we reach an agreement that we would enter  
19 a slip sheet in place of the fully redacted document simply  
20 stating that the whole document has been redacted. That was  
21 the agreement, that was the only agreement, and that was the  
22 only agreement that Mr. Parekh agreed to, which makes sense.  
23 It's just practical. There's been no agreement whatever.

24 What I did do, as well, Your Honor, thanks to Mr.  
25 Trischler's letter, I went back to the December 9th transcript,

1 which he selectively quoted from, and not surprisingly, Judge  
2 Schneider was on top of this issue when it first came up and  
3 was really pressant about where we are today. And if I can  
4 take a moment just to frame the issue, maybe I can take some of  
5 the heat off of this and make things easier going forward.  
6 Okay?

7 If I may, December 9th was literally the first week  
8 after all the defendants were to have completed their discovery  
9 on November 30th.

10 Now we know that didn't really happen because they've  
11 continued to supply or supplement tens of thousands of  
12 documents from November until now. We'll live with that, we'll  
13 work with that. But the fact remains that even as early as  
14 December 9th, with respect to Mylan, Ms. Hilton noted that they  
15 had already withheld 145,000 documents on the same basis that  
16 they are now, and she brought that issue up to Judge Schneider,  
17 who, in essence, said it's premature, it's not ripe yet. You  
18 need to meet and confer. This is a serious issue. And I'd  
19 like to read, with your indulgence, just a couple of sentences  
20 because it frames the issue beautifully.

21 He said, and I quote, this is at Page 33 of December  
22 9th, that transcript: "One thing you can take to the bank is  
23 the Court's not going to require plaintiff to go through  
24 145,000 documents. The Court's not going to require Mylan to  
25 look through 145,000 documents. So if the -- if the issue has

1 to be teed up, you have to figure out a way to get  
2 representative examples and categories so the Court can get  
3 their arms around this issue. So that's -- if we're doing that  
4 with Mylan, I think you should do that with everybody."

5 Now, full stop. What I propose to the Court and to  
6 counsel in my letter of last Friday is a framework to try to  
7 deal with this issue. And I want to say at the outset that I'm  
8 not at all insensitive -- we're not at all insensitive to the  
9 fact that we can't simply identify 10,000 documents and say to  
10 Clem, Clem, go look at these again. That's not what we're  
11 proposing. And to the extent my letter conveys that, I  
12 apologize.

13 What I think we should have is a system that tracks  
14 what I've proposed but limit it to a very limited number of  
15 documents so that we do what Judge Schneider anticipated we  
16 would have to do, and that is sharpen our pencils. I'm not  
17 going to have Layne spend hours and hours and hours coming up  
18 with thousands of potential documents only to impose upon the  
19 Court to create a sample and go through it.

20 What we're proposing, and this would apply to all  
21 defendants, is that to a number not to exceed 50 documents,  
22 tops, 50 documents, and prioritizing it to the custodians who  
23 are about to be deposed.

24 So, for example, take the 10,000 documents which are  
25 in dispute presently with Mylan. I'm proposing that we be



1 relegated to going back, figuring out which of the 10,000  
2 relate to upcoming witnesses who we're about to depose.  
3 Because, remember, the reason we're concerned about this is  
4 that we want to be able to have a full cache of documents to  
5 examine witnesses with. We want to have the burden of  
6 selecting from among the 10,000, if that's the disputed number,  
7 a limited number to a specific custodian, and even at that,  
8 limiting it to 50 documents, and then going through this  
9 procedure. So we make a challenge to a document that's  
10 withheld on the basis of not responsiveness, we provide that  
11 list of documents to the opposing side, whether it's Mylan or  
12 any defendant, so as not to exceed 50 documents. On Day 3 they  
13 either provide a justification as to why, in essence, a meet  
14 and confer, or agree to produce it. And two days later if we  
15 still have a problem, either the production occurs or the  
16 disputed documents, again not to exceed 50 documents, are  
17 presented to the Court for *in camera*.

18 That's precisely, I would suggest, what Judge  
19 Schneider anticipated, that we devise a system by which we can  
20 systematically address these disputes. We don't want to impose  
21 too great a burden on the defendants, that's why I propose  
22 limiting it to not exceeding 50 documents; but at the same  
23 time, it shouldn't prejudice plaintiffs in their preparation of  
24 these witnesses.

25 I know we don't live in a perfect world and I didn't

1 suggest the last time we were together that we should have the  
2 luxury of time to sit and dwell on documents and have time to  
3 review with experts, sure, that's in the perfect world. But in  
4 the highly imperfect world in which we're trying to meet the  
5 Court deadlines, I think this proposed structure makes sense.  
6 I don't want to impose a 10,000 document review on Mr.  
7 Trischler or anybody, and if we can limit it or cap it at 50  
8 documents per dispute, I think that's a very workable system,  
9 Your Honor.

10 JUDGE VANASKIE: Well, we've gotten a little further  
11 than I intended to get to today, but maybe we need to get  
12 there.

13 Mr. Trischler?

14 MR. TRISCHLER: Your Honor, Mr. Honik said a lot and  
15 I'm trying to digest it as quickly as I can.

16 Just going back through, the record will obviously  
17 speak for itself, but among other things, just to be clear,  
18 Mylan was not under any court order to complete document  
19 production by November of last year. There was an order  
20 extending the deadline because we were negotiating with the  
21 plaintiff on discontinuing the search. So that's fact number  
22 one.

23 Fact number two, when Mr. Honik referred to the  
24 conference with Judge Schneider, we did precisely what we told  
25 the Court we would do in that instance. The plaintiff raised

1 this same issue with the Court in December, there's no doubt  
2 about it, and we said, you know, per the ESI protocol, we'll go  
3 back and re-review these documents. And I can't remember the  
4 exact number. I'm sure if I misstate it, the plaintiffs will  
5 tell me I'm wrong, but I think at that time they were raising  
6 issues with respect to 70,000 documents. And we went back and  
7 we've spent time and money and had lawyers look at these 70,000  
8 documents a second time, Your Honor, at tremendous expense to  
9 our client, and found that I think about six percent of them,  
10 by the first team reviewers, may have been coded in error and  
11 we produced that six percent.

12 Now, this 10,000 set that Mr. Honik provided to the  
13 Court on Friday, the vast majority of them are from the same  
14 list that have already been reviewed by lawyers for Mylan  
15 twice. To go back and look at that global set a third time I  
16 think is not proportionate, it is not warranted.

17 What I hear Mr. Honik saying now is that he agrees,  
18 and so what the plaintiffs will do is instead of asking for  
19 10,000 documents, they'll ask for 50 per witness. I mean, I  
20 can only speak for Mylan, I can't speak for any of the other  
21 defendants, but speaking for Mylan, if the plaintiffs sent me a  
22 list and said, hey, Clem, what about these 50 documents, we  
23 think they're relevant, I'll get back to them in a short period  
24 of time. That's what our ESI protocol says we're going to do.

25 So, you know, I appreciate reducing the scope of this

1 thing from 10,000 to 50, that sounds reasonable and, in theory,  
2 workable; but I guess as in everything, Judge, the devil's in  
3 the detail. But, conceptionally, that sounds fine, it sounds  
4 like what we've been doing. It sounds like what the  
5 meet-and-confer process is all about.

6 MR. HONIK: Your Honor, there has to be a mechanism  
7 for challenging this. And I mean no disrespect to Mr.  
8 Trischler. The fact is that there are documents being withheld  
9 to which we're entitled and, therefore, there has to be a  
10 mechanism by which we can challenge it.

11 JUDGE VANASKIE: Well, what's the mechanism you're  
12 proposing? That's what I'm a little confused with now. Are  
13 you asking just for 50 documents or are you asking for 50  
14 documents as a random sample to test the --

15 MR. HONIK: No, Your Honor. We want -- we want to be  
16 tasked, on the plaintiffs' side, to identify from among a  
17 larger pool of suspect withheld documents a number not to  
18 exceed 50 that we challenge. In this way, Your Honor doesn't  
19 have to sample anything, it puts the work on us to identify  
20 those documents that we think are most crucial, not to exceed  
21 50, and all I'm proposing is that we do it by prioritization of  
22 upcoming custodians. So this is very -- this is very practical  
23 stuff.

24 JUDGE VANASKIE: Well, it sounded to me like Mr.  
25 Trischler was agreeable to that.

1 MR. HONIK: That's great. That's great.

2 MR. TRISCHLER: Your Honor, I can't say --

3 JUDGE VANASKIE: Did I hear you wrong?

4 MR. TRISCHLER: No, you did not hear me incorrectly,  
5 Your Honor. If I cut you or Ruben off, I apologize. But I  
6 just wanted to be clear that this started off as a Mylan issue  
7 and the plaintiffs have indicated that they have issues with  
8 other defendants. I can't speak for whether other defendants  
9 will find this to be a reasonable compromise, but, you know,  
10 I'm looking to move past document production issues. We've  
11 been burdened with them for far too long. Everyone has been  
12 burdened with them --

13 JUDGE VANASKIE: Sure.

14 MR. TRISCHLER: -- for far too long. And so if -- if,  
15 for instance, we have the -- in the case of Mylan, we have the  
16 deposition of Derrick Glover resuming on April 16, I believe.  
17 What I hear Mr. Honik to be saying is that before -- sometime  
18 between now and the end of the week that if he gives me a list  
19 of 50 documents that they want us to review for responsiveness,  
20 we'll provide an answer within three days whether we agree to  
21 produce them. And then I don't know, what's the proposal,  
22 Ruben, for if we don't --

23 MR. HONIK: Well, it's the proposal set out in my  
24 letter. It's basically -- what we're trying to do, Judge, is  
25 reduce the turnaround time to address these disputes.

1           The problem we're having, just to take a half a step  
2 back, I think we've stated this, is, we want to be prepared as  
3 these depositions are now taking place and have at our disposal  
4 all the documents that are germane to the custodian or witness  
5 and we don't want to have to revisit going back to them. If  
6 one looked at Judge Schneider's comments from December 9th of  
7 last year, he made it very clear that the idea here is to  
8 prevent our finding a document after a witness has been  
9 produced for examination under oath and then having to re-call  
10 that witness. He was very clear about that. That's the  
11 balance I think Your Honor, as Special Master, has to address.

12           And so what we proposed is the five-day process or  
13 turnaround to address withheld documents. On Day 1, it falls  
14 to us, plaintiffs, to challenge a number of documents not to  
15 exceed 50. By Day 3, two days later, the defendants have to  
16 provide a justification. If Clem can say, well, Document  
17 Number 8 and 9 and 10 are not responsive and here's why, we may  
18 be satisfied with that. And so, you know, and then by Day 5 we  
19 either have production or any remaining disputed documents,  
20 again not to exceed 50, are simply sent to you as the Special  
21 Master for review for responsiveness. And if they are  
22 responsive, they should be turned over immediately to us; and  
23 if not, it's the end of the day.

24           So we're trying to shorten the turnaround time because  
25 the example, for example, with Teva, just to cite one example,

1 it took us from December until I think a week or two ago to get  
2 through the process, and that's too long, Judge. We've got --  
3 you know, we're actively taking Teva depositions and we're  
4 discovering, as Mr. Davis pointed out, that we have emails but  
5 not attachments.

6 And let me just say, it took me awhile to understand  
7 this, virtually all of the documents that are disputed are  
8 attachments. So they're already connected in some way to a  
9 document that's already been identified as relevant and  
10 discoverable and responsive, and in order for us to have  
11 appropriate context of what the document is and what the  
12 attachments are, in many instances we're going to have to see  
13 those attachments. To the vast, vast majority, for example, of  
14 the 10,000 documents I sent you, according to Ms. Hilton, those  
15 are virtually all attachments to documents already produced.

16 So, longwinded way of saying we want the burden to  
17 fall to us to initiate the process; we just want the Court to  
18 bless the idea that we can have a turnaround of this dispute  
19 within five days and have it be manageable so it's not too  
20 burdensome for the defendants by capping it at 50 documents.

21 MR. TRISCHLER: Judge, I guess I'll just conclude from  
22 my perspective by saying, conceptually, what Mr. Honik has  
23 outlined seems reasonable to me, but it would -- it will --  
24 this proposal will undoubtedly impact other defendants as well.  
25 So, in fairness, I would like to be able to confer with the

1 defense group and make certain -- you know, and see if it's a  
2 proposal that makes sense globally before I give it, you know,  
3 my personal blessing, if that makes sense.

4 JUDGE VANASKIE: Yes, I think that opportunity should  
5 be provided, that the defense group should confer and report  
6 back to me in writing about whether they're acceptable or which  
7 of the defense group is agreeable to this approach and which  
8 are not and move on in that manner.

9 I'm not going to order it today, Mr. Honik, as  
10 something that all the defendants have to do. I think it is a  
11 reasonable approach and I certainly would encourage defense  
12 counsel to give it serious consideration; but I'm not going to  
13 order it today.

14 What I'll look for is -- I don't want to push it off  
15 to next Wednesday but if we could get a written reply from  
16 defense counsel by Monday as to whether Mr. Honik's proposal is  
17 acceptable, and if it's not, then we'll address it again on  
18 Wednesday. It may be that it's something that would be ordered  
19 but I'd rather see it be a matter that's negotiated and agreed  
20 to as opposed to something that's compelled. All right?

21 MR. HONIK: Thank you, Your Honor. That's very  
22 useful. Thank you.

23 MR. TRISCHLER: That's fine. That's fine, Your Honor.

24 JUDGE VANASKIE: Thank you, Mr. Trischler.

25 Now, getting back to the Mylan documents, and I heard



1 Mr. Trischler say, well, the ESI protocol said nonresponsive  
2 attachments do not need to be produced. Is that correct?

3 MR. PAREKH: Your Honor, this is Behram Parekh. If I  
4 may, since --

5 JUDGE VANASKIE: Yes.

6 MR. PAREKH: -- I negotiated the original ESI protocol  
7 and I had all the dealings with Mr. Ferretti afterwards  
8 regarding that.

9 JUDGE VANASKIE: Okay.

10 MR. PAREKH: So, the issue is not nonresponsive  
11 documents. And that's really where the fundamental issue  
12 becomes. The issue that defendants had was with documents that  
13 related to other products. And that was the issue that was at  
14 the bottom of this agreement, that defendants were concerned  
15 that plaintiffs would go on a fishing expedition and find out  
16 information about other products and then potentially use that  
17 information to initiate lawsuits about unrelated entities.

18 This was argued before Judge Schneider back in 2019  
19 when we were negotiating the ESI protocol, and the agreement  
20 that we reached was if there were email attachments or other  
21 documents that related solely to other products, not to  
22 valsartan and other products but solely to other products, that  
23 were not responsive to a discovery request, those could be  
24 redacted or withheld.

25 As time went on, we realized that redacting 49 pages

1 out of a 50-page Excel spreadsheet because one page of that  
2 Excel spreadsheet happened to have the word "valsartan" on it  
3 didn't make sense. And so Mr. Ferretti and I engaged in some  
4 meet and confer and we agreed that, yes, if a withheld  
5 attachment related to primarily other products, mentioned  
6 valsartan but that mention of valsartan was not otherwise  
7 responsive to a discovery request, that that document could be  
8 slip sheeted instead of being redacted with only the word  
9 "valsartan" left. That was as a matter of convenience to  
10 defendants to avoid them having to do a lot of work, it was an  
11 accommodation that we made to allow them to do that. But the  
12 issue was never that simply because there are attachments to an  
13 email that are otherwise relevant -- to a relevant email that  
14 was being produced and that would otherwise be an attachment  
15 that was included, that that could be withheld simply because  
16 defendants thought that that particular attachment was not  
17 directly responsive to a discovery request, unless that  
18 attachment specifically related to a different drug product.  
19 And that's where the fundamental issue here comes from. It's  
20 not just any document that's marginally relevant or not  
21 relevant. The only ones that were allowed to be withheld are  
22 ones that related to other drug products.

23 JUDGE VANASKIE: Well, here's what -- because this  
24 issue has evolved, I would say, or it's being -- it's changing.  
25 I started describing documents and I'm told, well, they were

1 attachments to an email and as attachments, they should have  
2 been produced for context; but my looking at the document, I  
3 can't tell whether it was an attachment to an email and I can  
4 say on the face of the document it looks nonresponsive, it  
5 doesn't have anything to do with this particular matter, you  
6 know, or it's a blank checklist that, as I said, the way I  
7 looked at that document, maybe I'm sensitized to a matter I  
8 recently handled, it looked like a document to evaluate  
9 somebody's computer programs, which would have nothing to do  
10 with this case.

11 I'm wondering, I'm wondering out loud now, whether the  
12 burden shouldn't be on the plaintiff to, when they've received  
13 an email and they didn't get the attachments, they have to have  
14 engaged in a meet and confer with the defense counsel and say,  
15 hey, where are the attachments and why aren't they being  
16 produced? And if the argument is they're nonresponsive, well,  
17 then either the plaintiff has to accept it or has to move and  
18 say, no, we get all the attachments; because the email's  
19 relevant, we get all the attachments.

20 Right now I'm going through documents sort of --  
21 that's why I wanted to have this conversation -- sort of blind  
22 in a sense. I can look for documents that say valsartan, I can  
23 look for documents that talk about API, I can look for  
24 documents that have some relevance, but when I see a checklist  
25 like this, I have to say, I don't see that as responsive. And

1 why? Because I didn't realize it's an attachment to an email  
2 that maybe is necessary to understand that email better. I'm  
3 musing out loud here.

4 I can go through these 350 documents and look at them  
5 on their face and say responsive, not responsive, and give you  
6 some sense of that, and that's all I can -- I think that's all  
7 I can do. Correct me if I'm wrong. What else can I do right  
8 now?

9 MR. TRISCHLER: Well, Your Honor, I don't -- I don't  
10 -- I think -- I sense the Court's concern and limitations with  
11 the exercise and, you know, I certainly don't want to prolong  
12 this.

13 JUDGE VANASKIE: Right.

14 MR. TRISCHLER: I'm open to considering Mr. Honik's  
15 compromise. The issue that we've always had from the defense  
16 side is one of proportionality, as I said. When we were  
17 presented with this issue in the fall, it was, we want you to  
18 re-review 70,000 documents, then it was 4200 of the 10,000. If  
19 we can reduce it to something manageable, which is what I've  
20 heard the current proposal is, I think that's fair and -- and,  
21 you know, I'm willing to go back to the defense group and see  
22 if we can make a collective agreement on that to try to move  
23 this forward and save everybody time and exercise. But --

24 JUDGE VANASKIE: Okay.

25 MR. TRISCHLER: I think we can certainly do that and

1 report back to the Court by Monday and report to the plaintiffs  
2 before then as well.

3 MR. HONIK: And, Your Honor, I greatly appreciate that  
4 you are blind in the sense of not having the context for these  
5 350 documents. You're looking at them completely out of  
6 context.

7 And I, like Mr. Trischler, I'd like an opportunity to  
8 go back to particularly my Mylan team and provide a solution  
9 for that. If it makes better sense to evaluate the documents  
10 in question by our identifying, for example, the emails that  
11 they are related to, I think it should fall to us to do that.  
12 I think we can do that, I believe we have that capacity,  
13 because they come down as, you know, family matters. Ms.  
14 Hilton is here, she can feel free to weigh in and say if that's  
15 achievable. But I would like until Monday to be able to submit  
16 a kind of proposal as well so that Your Honor has an  
17 appropriate context to understand the 350 sample documents.

18 JUDGE VANASKIE: Yes. You have the Bates numbers of  
19 the documents, so I take it by knowing the Bates numbers, just  
20 as Mr. Davis did now, you could tell whether it was associated  
21 with another document or with an attachment to an email. So I  
22 would appreciate that rather than me just going through it and  
23 looking at the face of the document and saying, oh, I don't see  
24 how this has anything to do with the case. It may have  
25 something to do, but I can't tell that.

1 MR. TRISCHLER: Understood.

2 JUDGE VANASKIE: All right. So you'll have until  
3 Monday.

4 Go ahead, who's going to speak now?

5 MS. HILTON: Your Honor, if I may, Layne Hilton on  
6 behalf of the plaintiffs.

7 One thing I did want to make sure to mention is Your  
8 Honor discussed that you believed the burden should be on us to  
9 make requests when we review documents and see withheld  
10 attachments. I just wanted to point out that plaintiffs across  
11 the defendants have been engaging in this process. The  
12 difficulty that we are finding, however, is that it is a -- it  
13 is a timely -- it is a time-consuming process and it is taking  
14 a matter of weeks to receive the documents after a challenge,  
15 which is why, in part, we proceeded to try to come up with a  
16 solution to expedite this, because it is coming up in the  
17 context of deposition review of depositions that are happening  
18 in the next week. And so, you know, to the extent that we see  
19 documents and we've gone through the emails and we're going to  
20 use the emails potentially as deposition exhibits, we'd like to  
21 be able to receive the attachments in a very expedited manner.  
22 So we have been engaging in that process.

23 JUDGE VANASKIE: All right. Very well. Thank you.

24 MR. DAVIS: Your Honor, John Davis for the plaintiffs.  
25 One more thing.

1           Of course, we'll go back and confer on our team about  
2 this as well, but the volume of documents, again, we're dealing  
3 with here is substantial. Even when we're talking just about  
4 -- just about emails and attachments, those families of  
5 documents, we're still talking in the tens of thousands of  
6 documents that are withheld as family groups, at least. I  
7 haven't looked at the number personally but I think the volume  
8 that we're dealing with in totality, it would not surprise me  
9 if we're dealing with, you know, many tens of thousands of  
10 documents here. But we'll talk on our end and see what works.  
11 But I wanted to preview that issue for the Court that that's  
12 not an insubstantial challenge to identify all the email  
13 groups.

14           JUDGE VANASKIE: All right. Thank you. Thank you,  
15 Mr. Davis.

16           All right. Well, I'm glad we had this discussion and  
17 it is a -- a path forward has been offered. Let's see if that  
18 path can be taken. I will hold off on my review of these 350  
19 documents and wait to hear from you all in terms of whether I  
20 need to continue with that process or there is some other  
21 solution that you all can agree to. Perhaps it's Mr. Honik's  
22 solution that would be the one that both sides can agree to.  
23 So we'll complete that for today.

24           With respect to the other issues, I know I have the  
25 Meridan and ToxRox issue to resolve and I think that basically

1 covers everything that needs to be covered today.

2 Is there anything else from either side of the case?

3 MS. HILTON: Your Honor, if I may.

4 JUDGE VANASKIE: Yes, Ms. Hilton.

5 MS. HILTON: Layne Hilton on behalf of plaintiffs.

6 Going back to the issue of the translations of English  
7 language documents into Mandarin, there was one exception that  
8 I wanted to raise with the Court because it actually has to do  
9 with the deposition I am taking in a matter of hours of a  
10 witness who is located in China who is using a translator but  
11 who is a reader of English, and I had come to an agreement with  
12 counsel for ZHP prior to this sort of bubbling of this issue  
13 that I should be afforded the opportunity to use the witness's  
14 documents, a significant volume of which were drafted and  
15 authored by the witness in English, with him without having to  
16 translate those documents into Mandarin, in part because I'm  
17 looking at his resumé right here, this is a witness who has  
18 authored seven pages of --

19 MR. GOLDBERG: Your Honor --

20 JUDGE VANASKIE: Go ahead, Mr. Goldberg.

21 MR. GOLDBERG: Your Honor, this is Seth Goldberg.

22 This is Seth Goldberg.

23 You know, I don't -- if Ms. Hilton is concerned that  
24 what Your Honor has said today would somehow impact this  
25 witness, I can assure Ms. Hilton that our agreement as to this



1 witness stands. I mean, this witness reads English. What Your  
2 Honor was really ruling on were those Chinese witnesses who  
3 can't read English.

4 So I hope that allays any concern you have, Ms.  
5 Hilton.

6 MS. HILTON: It does, Mr. Goldberg. I just wanted to  
7 put that on the record so, you know, in the event that -- I  
8 didn't want to be in violation of any court order. So, thank  
9 you, Your Honor.

10 JUDGE VANASKIE: You would not have been, and I  
11 understand it will take some time. I'm glad to hear that you  
12 worked cooperatively to let this deposition go forward.

13 All right. Anything else?

14 MS. GOLDENBERG: Yes, Your Honor. This is Marlene  
15 Goldenberg for plaintiffs.

16 I'm not sure if you saw the letters that both Ms.  
17 Heinz and I filed earlier today. It sounds like it's not an  
18 issue that you're interested in hearing today, which we  
19 understand; but I will say that this issue impacts depositions  
20 that are scheduled for fairly soon. So we are -- I am hoping  
21 that we could either have an expedited hearing with you later  
22 this week, on Friday perhaps, or that we could get this  
23 resolved on the papers so that we can get moving.

24 I have spoken to someone over at my process server's  
25 office and she's told me that if we do have to go through the

1 Hague on these subpoenas, I am looking at a four-to-six-month  
2 turnaround.

3 JUDGE VANASKIE: No, I know it's going to be a lengthy  
4 process. You're also correct, Ms. Goldenberg, in saying I  
5 wasn't expecting to address it today, but I would be available  
6 Friday if you -- and I saw your letter but I don't know that I  
7 saw Ms. Heinz's letter on this particular issue.

8 MS. GOLDENBERG: I think it was filed shortly before  
9 the hearing started; but in fairness to her, I didn't want to  
10 flag that because we did both send one.

11 THE COURT: Okay. Ms. Heinz, are you available on  
12 Friday?

13 MS. HEINZ: Hi. Yes, Your Honor. Just real quick.

14 That's fine, if Your Honor wants to have a conference  
15 on Friday, I can certainly make myself available. That's not a  
16 problem. But I just want to be clear about what is going to be  
17 discussed during the conference because the position here is  
18 that this issue is based on a protocol that the parties went  
19 back and forth back in the fall of 2020 exchanging drafts on  
20 and they -- it was approved by the Court in October of 2020.  
21 To the extent that plaintiffs are now arguing that they don't  
22 have to comply with that protocol, I think the proper course of  
23 action is to file a motion to revise the protocol or amend the  
24 protocol. And I would ask that if that's the way that they --  
25 the position that the plaintiffs are taking that they shouldn't

1 have to comply with the protocol, I think the proper course of  
2 action is for them to file a motion rather than us just jumping  
3 to a hearing on this issue. And I think that we should have a  
4 briefing schedule as well. And we're fine if the Court wants  
5 to expedite that, we can certainly work within expedited  
6 deadlines; but I do think that's the proper course of action  
7 here.

8 JUDGE VANASKIE: Ms. Goldenberg.

9 MS. GOLDENBERG: Yes, Your Honor, I'll just note that,  
10 you know, we're not saying that protocol doesn't apply. We  
11 think that what we're doing is within the confines of the  
12 protocol and we just, apparently, have different  
13 interpretations of it.

14 JUDGE VANASKIE: And so the issue here is service  
15 through the Hague Convention procedures or not?

16 MS. GOLDENBERG: It's whether or not these witnesses  
17 would qualify for Rule 30 service; and if they don't, then,  
18 yes, we would have to go through the Hague. And so it's more  
19 of a threshold question.

20 JUDGE VANASKIE: All right. And you're saying, Ms.  
21 Heinz, that this is covered by the protocol and you'd have to  
22 modify the protocol. Is that your position?

23 MS. HEINZ: Yes, Judge. That's correct, Your Honor.  
24 I don't agree with the plaintiffs' position as to Rule 30.  
25 Compliance with the protocol isn't optional here nor is it

1 qualified by Rule 30 or Rule 45 or any -- this is language that  
2 the parties agreed to and that the Court approved and the  
3 protocol itself explicitly contemplates modification of the  
4 rule to comply with the Hague Convention.

5 I mean, I can keep going on but I do understand if the  
6 Court doesn't want to get into everything today and would  
7 rather put this off until Friday, that's fine with me. But I  
8 just wanted to put on the record that the proper course of  
9 action, given the fact that this is a court-approved protocol,  
10 plaintiffs must file a motion to amend that protocol if they're  
11 not going to -- if they don't want to comply with what --

12 JUDGE VANASKIE: All right. I don't want to get -- I  
13 don't want to get hung up on process unnecessarily here. Let's  
14 have a -- I'll send out an order, we'll have a Zoom session on  
15 Friday on this, if that's all right. But I will try to get it  
16 resolved then. Okay?

17 So if you want to submit anything to me, submit it to  
18 me in advance of Friday.

19 MS. GOLDENBERG: I think we'll rest on our submissions  
20 that we've already given you, Your Honor. If you have  
21 questions, we're happy to answer them, but I think we've  
22 covered it.

23 JUDGE VANASKIE: Ms. Heinz, am I prejudicing you by  
24 asking for it by Friday? Do you want more time?

25 MS. HEINZ: No, Your Honor. And we may have a

1 supplemental filing prior to Friday but we do think that our  
2 issues are sufficiently stated in our letter today. However, I  
3 will file a supplemental filing, if necessary. Thank you.

4 JUDGE VANASKIE: Thank you. I will send out an order  
5 that schedules a call for Friday. We won't need everybody  
6 involved but everybody will get notice of it, that's for sure.

7 Is there anything else we should address today?

8 MS. GOLDENBERG: I'll just note that I suppose if Ms.  
9 Heinz is filing something, I don't know if I need to respond  
10 yet, but I'll just put it on the record that I'll reserve my  
11 right to do that if we feel the need to. But, otherwise, we  
12 look forward to speaking with you on Friday and we appreciate  
13 you scheduling the expedited hearing.

14 JUDGE VANASKIE: That will be fine.

15 All right. Anything else?

16 MR. TISCHLER: Judge --

17 MS. LOCKARD: Your Honor, it's Victoria Lockard.

18 JUDGE VANASKIE: Hold on, hold on. Go ahead.

19 MS. LOCKARD: It's Victoria Lockard. I do have one  
20 issue to address. I don't know if Mr. Tischler was planning to  
21 address this as well, but I think it's a question that we both  
22 wanted clarification on.

23 MR. TRISCHLER: Well, I was going to raise an issue.  
24 I hope it's the same one that Victoria was thinking about,  
25 Judge, but if you can indulge me for a few minutes.

1 JUDGE VANASKIE: Sure.

2 MR. TRISCHLER: There's an issue that's come to light  
3 that I think you might be able to help the parties on moving  
4 forward with these depositions.

5 About a week or so ago, and I believe it was in the  
6 context of the Court's hearing on the translation issues  
7 between the PFC and ZHP, there was some discussion about the  
8 need to translate documents for the benefit of the witness and  
9 I think the Court indicated that while a document was being  
10 translated to the witness the parties could go off record and  
11 that the time of translation would not count toward the seven  
12 hours of deposition time to which the plaintiffs are entitled.

13 Since that time, it's come to my attention that what  
14 plaintiffs have been doing is in all depositions of defendants'  
15 representatives, English-speaking witnesses shown English-  
16 speaking documents that as soon as they're handed the document,  
17 plaintiffs have asked to go off the record and any review time  
18 takes place off the record.

19 It may sound like a small issue, Judge, but it becomes  
20 important in this respect: What the -- what Judge Schneider  
21 did in coming up with the deposition schedule was to decide  
22 that the plaintiffs are entitled to seven hours with every  
23 witness in the case. That's the minimum that I'm aware of.  
24 For several corporate representatives, depositions are more  
25 than seven hours. In some cases, for my client, as many as

1 three days; in some cases, for ZHP, as many as five days. And  
2 as we all know, when you have seven hours of testimony on the  
3 record, you're talking about a deposition that's going to be at  
4 least ten hours. And when there are stoppages every time a  
5 witness is handed a document and has to review it to answer  
6 questions about it, that ten-hour deposition becomes, in  
7 reality, a 12-hour deposition. And since our deposition  
8 protocol says that depositions should start at 9:00 and end at  
9 6:00 for stateside witnesses, in particular, the reality of it  
10 is is that a seven-hour deposition can't even get done in one  
11 day. So I don't think there's any basis to go on and off the  
12 record and slow the proceeding every time a witness is handed a  
13 document and asked to read it or is entitled to review it for  
14 context before answering a question.

15 If Your Honor could provide some guidance as to  
16 whether that was the intent of the comments that came up in the  
17 ZHP hearing, I think it would certainly be helpful because I  
18 think all that would do is prolong depositions unnecessarily  
19 and turn what should be one-day depositions into two-day  
20 exercises, which, given the volume of discovery in this case, I  
21 certainly don't want to go through and don't want to put the  
22 witnesses through.

23 MR. SLATER: Your Honor, this is Adam Slater, if I  
24 could.

25 JUDGE VANASKIE: Go ahead, Mr. Slater.

1           MR. SLATER: I do think Your Honor's already addressed  
2 this issue in detail. You ruled that if the witness wants to  
3 take the time to read a document, that the clock stops, they  
4 can read it and then the clock goes back on when they say  
5 they're ready to answer. I, frankly, don't appreciate, without  
6 any notice, different lawyers now on the defense team  
7 essentially trying to raise this issue and say, well, you know,  
8 it's an issue over here, I don't know if it's the same issue.  
9 I think it's very clear, Your Honor has ruled on this, we have  
10 a clear pathway, we'll all abide by it, and I don't intend to  
11 say anything else other than you've ruled on this already. I  
12 don't think it's appropriate for it to be raised again at this  
13 point.

14           MS. LOCKARD: Your Honor, if I may just jump in.  
15           The reason that I'm inviting you to clarify this is  
16 because I have a deposition of a witness to begin tomorrow in  
17 Israel. The deposition starts at 1:00. If we're required to  
18 go off the record every time the witness wants to read an  
19 exhibit, which he is absolutely entitled to do, we're going to  
20 be going at it until 3:00 a.m. And I certainly think, you  
21 know, if any party is abusing this, it can be brought to the  
22 Court's attention, but it's entirely disruptive, it prolongs  
23 the deposition and I have never seen this in a deposition where  
24 you go off the record each and every time an exhibit is  
25 discussed or shown. You know, if it is a 500-page monograph



1 and the witness does need significant time, I completely  
2 understand and I'm willing to work with counsel; but, you know,  
3 every time a witness stops to look at a document, we should not  
4 have to stop the deposition. I've never seen that, it's highly  
5 unusual and it's disruptive and I would like to just have  
6 clarification on that before we begin at 6:00 in the morning  
7 Eastern time, 1:00 p.m. Tel Aviv time.

8 JUDGE VANASKIE: Okay. Well, it seems to me that if  
9 you need clarification, a rule of reason should be employed.  
10 In other words, you don't stop the clock every time a document  
11 is shown to a witness but maybe the clock stops after so many  
12 minutes of the witness looking at the document. If the witness  
13 is going to take, I don't want to be arbitrary about this, but  
14 let's choose an arbitrary number, more than five minutes  
15 looking at a document, well, that clock should stop. But if a  
16 witness is going to spend 30 seconds looking at a document, no  
17 need for the clock to stop. I hate to umpire something like  
18 this but it seems to me -- that's why I said a rule of reason  
19 type of approach here. What's reasonable? And if you can't  
20 agree on what's reasonable, then I'll choose an arbitrary  
21 number. This way the witness -- if the witness -- if it's a  
22 600-page monograph and the witness wants to flip page by page  
23 through the monograph, well, then the clock will stop. If it's  
24 a five-page document, the witness wants to take two minutes to  
25 review it, the clock will keep running. I'm hoping you can

1 agree to something like this but I could also impose it as a  
2 requirement.

3 Mr. Slater?

4 MR. SLATER: Yeah, Your Honor, after you ruled in a  
5 very contentious deposition, with respect to my colleagues on  
6 the defense side of the table, I doubt their depositions are  
7 getting to the level of what was going on during the deposition  
8 when we kept coming to Your Honor. And I can tell you that  
9 what you did is you solved the problem. You said, if the  
10 witness says, I want to review the document, we stop the clock,  
11 we didn't go off the record, we kept the video going --

12 JUDGE VANASKIE: Right.

13 MR. SLATER: -- the stenographer was there, and then  
14 the witness said, okay, I'm ready, and then we said the clock  
15 went on. There was not another dispute in the deposition that  
16 way. And if the witness takes 30 seconds or a minute, then --  
17 and the timer went off after 30 seconds or a minute, I don't  
18 think that defense counsel's concerns are real because who  
19 cares if it's 30 seconds or a minute. The bright-line rule is  
20 the only way this is going to work because we are never going  
21 to agree. We don't want to have to retrospectively go back and  
22 fight over 15 minutes of time in a two-day deposition. It will  
23 be unworkable, unfortunately.

24 I can tell you in the depositions, the end of the Peng  
25 Dong deposition, and then the Eric Gu deposition I took Sunday

1 and Monday night with the same two defense lawyers from ZHP,  
2 there was not one argument about it again after that. It was  
3 understood, we went off the clock, we went back on the clock,  
4 and it probably served to help the witness to review for less  
5 time because it wasn't going to be something where it was going  
6 to be a delay that we were going to be tabbed with.

7           So I would say your ruling worked and if someone wants  
8 to come back to you at some point and say the ruling's not  
9 working, I guess they can try to do that. But I think that if  
10 you want to put this to bed and you don't want to have  
11 arguments coming over three minutes here and 17 minutes there,  
12 you need to just adhere to the ruling you made because it  
13 worked in the ZHP depositions.

14           JUDGE VANASKIE: All right. Mr. Trischler or Ms.  
15 Lockard.

16           MR. GOLDBERG: Your Honor, this is Seth Goldberg.

17           THE COURT: Mr. Goldberg, go ahead.

18           MR. GOLDBERG: I just want to clarify one thing about  
19 the ruling that happened with respect to ZHP. My recollection  
20 is that the ruling and why we'd gone off the record -- we've  
21 stopped the clock but stayed on the record was because this had  
22 to do with the translation of the documents, and what we were  
23 doing was stopping the clock if a document -- what your ruling  
24 was is if a document had to be site translated, then you'd go  
25 off the record so that could happen.

1 JUDGE VANASKIE: Go off the clock.

2 MR. GOLDBERG: I'm sorry, you'd stop the clock --

3 MR. SLATER: Judge --

4 MR. GOLDBERG: -- but you'd stay on the record.

5 MR. SLATER: But, Judge, that's not actually accurate.

6 MR. GOLDBERG: And that made sense, and that made  
7 sense in that context, but it's not the same issue that we deal  
8 with with English-speaking witnesses and witnesses -- and any  
9 other witnesses. I mean, this has -- that had to do with the  
10 translation issue.

11 MR. SLATER: Your Honor, it's Adam Slater. I was in  
12 the deposition. Mr. Goldberg didn't participate in the  
13 deposition. It's not accurate. It was whether the witness was  
14 reading in their own language or not.

15 Eric Gu, who I deposed Sunday and Monday night, was  
16 educated in the United States, was fluent in English, didn't  
17 need a translator. There were a few times during the  
18 deposition where he said, can I have a moment to read the  
19 document. I said, we'll go off the timer. He read it. He  
20 said, okay, I'm ready, and we went back on the timer and I  
21 continued. So it's not what Mr. Goldberg said.

22 This is -- you're going to create such a problem over  
23 something that doesn't have to be a problem if we revisit this  
24 issue. It needs to just be the bright line and it will not be  
25 a problem going forward.

1 I will say one thing on behalf of all plaintiffs. Any  
2 plaintiff who would hand a document to the witness and say, go  
3 off the timer right now because I just handed a document to the  
4 witness before the witness says, I need time to review it, that  
5 would not be appropriate. If anyone's done that, they  
6 shouldn't have done it. But if the document is put up and the  
7 witness is going to then say, I need to read this for a moment,  
8 you go off the timer, they do it. Otherwise, as you said, you  
9 can't come up with a bright line -- I mean with a moving  
10 target. It either has to be the way that you ruled the other  
11 day or it's going to be a bunch of arguments over this which is  
12 not going to be good for anybody.

13 MR. TRISCHLER: The problem is, with all due respect  
14 to Mr. Slater, is that it has happened exactly as he indicated  
15 that the plaintiffs would not do. There have been instances  
16 where a witness has been handed a document, said here's Exhibit  
17 67, let's go off the record.

18 MR. SLATER: I agree that shouldn't happen. So we  
19 just solved the problem.

20 MR. TRISCHLER: And that's why -- and that's why I  
21 raised the issue, Adam, with the Court today to seek guidance.  
22 I think the rule of reason the Judge cited, it's what we've  
23 used in every case that I've ever been a part of, is what  
24 works. And I just wanted to make sure going forward. And my  
25 understanding was the same as what Mr. Goldberg indicated, the

1 ruling --

2 MR. SLATER: Well, I would ask this.

3 MR. TRISCHLER: -- was about the translation and that

4 --

5 MR. SLATER: I would ask this.

6 JUDGE VANASKIE: Hold on. Hold on, Mr. Slater. Let

7 Mr. Trischler finish.

8 Go ahead, Mr. Trischler.

9 MR. TRISCHLER: I simply don't want to see a situation  
10 where we're going on and off the record every time a witness is  
11 handed a document because it's only going to prolong  
12 depositions. That's all I'm asking for.

13 MR. SLATER: Listen, I agree with you. And next time  
14 --

15 MR. TRISCHLER: That's not what's going to happen.

16 MR. SLATER: -- I ask you to send me a letter as  
17 liaison for the plaintiffs and say, hey, there's a problem, can  
18 you talk to your team about it. And you know what, it would  
19 have been taken care of as opposed to it being dropped on us at  
20 the end of a nine-hour hearing, or however long we've been  
21 going now, because nobody who handles this stuff is going to  
22 say that's reasonable. There was probably a misunderstanding  
23 by plaintiffs' counsel as to what they were supposed to do.  
24 I'm sure that won't happen again. If it does, you have -- call  
25 me up. I will be happy to jump on the phone with someone and

1 say, you can't stop the clock every time you hand a document.

2 MR. DAVIS: Your Honor, I feel like I am being  
3 referred to here by Mr. Trischler. This is John Davis, for the  
4 record. I will say that after two days of Mr. Glover, we had  
5 no issue with this.

6 At the deposition of Dr. Snider, which took place last  
7 week -- and, by the way, Dr. Snider testified that he's been  
8 deposed dozens of times to not remember how many times he's  
9 been deposed. He's a very professional, seasoned witness. I  
10 did not start doing that with Dr. Snider and for short  
11 documents I did not do that with Dr. Snider. I only started  
12 doing that with Dr. Snider when he took 15 minutes on the  
13 record reviewing -- reviewing a document. And then I started,  
14 for longer documents, I started stopping the clock when I  
15 handed one to him because it was his practice to read every  
16 single line of the document that I handed to him. And then we  
17 would go back on the record. It worked, you know.

18 I understood there not to be a single issue with it at  
19 the deposition. Mr. Trischler raised no issue with it at the  
20 deposition as it was occurring. I did not do it for all  
21 documents. I only did it for longer documents where, in fact,  
22 when we did go off the record, Dr. Snider still spent ten  
23 minutes reviewing the document. So I'm not sure -- you know,  
24 and, again, this is something that I just learned about as  
25 being an issue just now as well.

1 Thank you.

2 JUDGE VANASKIE: All right. Thank you, Mr. Davis.

3 What I'm going to suggest is, going forward, the  
4 witness is handed a document, the clock keeps running. When  
5 the witness asks to review the entire document, and it's a  
6 document that is several pages long, then you can ask that the  
7 clock be stopped. I say several, more than ten pages.

8 I don't want to have arbitrary rules. I think you all  
9 sitting in the deposition are in the best position to say,  
10 well, we should go off the clock here. I think both sides  
11 should be able to do that. Mr. Slater said a good rule was if  
12 the witness asks to review the document, stop the clock.  
13 That's a good rule. I'd like to see you agree to follow that.  
14 And that's what we'll impose here. Only when the witness asks  
15 to review the entire document or review parts of the document,  
16 the clock should stop. Otherwise, that clock keeps running.  
17 And under no circumstances should a plaintiffs' counsel hand a  
18 document to a witness and say stop the clock. All right?

19 MR. SLATER: Thank you, Your Honor.

20 JUDGE VANASKIE: That's the guidance I'm giving you  
21 going forward.

22 MR. SLATER: Great.

23 JUDGE VANASKIE: Anything else?

24 MR. SLATER: Stop asking that.

25 JUDGE VANASKIE: Yes, Adam. All right. Thank you all



1 very much. Have a good evening.

2 MR. SLATER: Have a nice day, Judge. Thank you very  
3 much.

4 JUDGE VANASKIE: Bye-bye.

5 MR. GOLDBERG: Thank you. Thank you, Your Honor.

6 (The proceedings concluded at 3:59 p.m.)

7 - - - - -

8  
9 I certify that the foregoing is a correct transcript  
10 from the record of proceedings in the above-entitled matter.

11

12 /S/ Camille Pedano, CCR, RMR, CRR, CRC, RPR  
13 Court Reporter/Transcriber

14 04/09/2021  
15 Date

16

17

18

19

20

21

22

23

24

25

/	2:00 [2] - 1:9, 4:2	70130 [1] - 1:20 78746 [1] - 2:9	76:11, 77:21, 80:25 ADAM [1] - 1:13 add [2] - 38:24, 41:13 additional [1] - 4:23 address [17] - 4:17, 5:18, 6:15, 13:22, 20:3, 23:10, 26:10, 35:9, 49:20, 53:25, 54:11, 54:13, 56:17, 66:5, 69:7, 69:20, 69:21 addressed [4] - 4:14, 17:24, 26:12, 72:1 addresses [1] - 5:18 addressing [1] - 25:23 adequate [1] - 36:15 adhere [1] - 75:12 advance [3] - 7:16, 45:5, 68:18 advanced [1] - 44:23 advice [1] - 31:6 Aerospatiale [1] - 31:7 afforded [1] - 64:13 afield [1] - 43:24 afternoon [5] - 11:1, 34:25, 35:1, 36:1, 36:2 afterwards [1] - 57:7 ago [4] - 30:19, 44:8, 55:1, 70:5 agree [17] - 7:3, 7:4, 7:8, 23:19, 23:22, 29:7, 49:14, 53:20, 63:21, 63:22, 67:24, 73:20, 74:1, 74:21, 77:18, 78:13, 80:13 agreeable [6] - 5:2, 6:25, 9:14, 52:25, 56:7 agreed [5] - 44:4, 46:22, 56:19, 58:4, 68:2 agreement [19] - 25:9, 44:7, 44:10, 44:21, 44:24, 46:6, 46:8, 46:10, 46:13, 46:18, 46:21, 46:22, 46:23, 57:14, 57:19, 60:22, 64:11, 64:25 agreements [1] - 44:3 agrees [1] - 51:17 ahead [9] - 8:21, 21:25, 43:22, 62:4, 64:20, 69:18, 71:25, 75:17, 78:8 AI [1] - 12:2 aided [1] - 1:25 ALFANO [1] - 2:15 allays [1] - 65:4	alleviate [3] - 15:10, 28:21, 33:4 allow [2] - 39:7, 58:11 allowed [1] - 58:21 almost [2] - 10:10, 31:12 alone [1] - 38:19 ALSO [1] - 3:8 Amazon [3] - 7:6, 11:9, 11:10 amend [2] - 66:23, 68:10 analysis [1] - 37:5 answer [7] - 23:3, 35:22, 38:11, 53:20, 68:21, 71:5, 72:5 answering [1] - 71:14 answers [1] - 5:22 anticipated [2] - 48:15, 49:19 anyway [1] - 19:1 API [4] - 38:7, 40:18, 40:20, 59:23 apologize [3] - 43:19, 48:12, 53:5 appear [2] - 13:4, 39:21 appearance [1] - 21:3 applicable [2] - 38:12 apply [2] - 48:20, 67:10 appreciate [6] - 17:24, 51:25, 61:3, 61:22, 69:12, 72:5 approach [3] - 56:7, 56:11, 73:19 appropriate [6] - 22:9, 30:8, 55:11, 61:17, 72:12, 77:5 appropriately [1] - 34:15 approved [3] - 66:20, 68:2, 68:9 April [2] - 1:9, 53:16 arbitrary [5] - 17:15, 73:13, 73:14, 73:20, 80:8 areas [1] - 20:2 argue [3] - 6:7, 34:17, 38:2 argued [2] - 18:25, 57:18 arguing [3] - 44:23, 45:20, 66:21 argument [7] - 15:14, 15:15, 26:9, 42:23, 45:9, 59:16, 75:2 arguments [2] - 75:11, 77:11 arms [1] - 48:3
/S [1] - 81:12	3	8		
0	3 [2] - 49:12, 54:15 30 [9] - 2:12, 45:16, 67:17, 67:24, 68:1, 73:16, 74:16, 74:17, 74:19 300 [1] - 27:12 300-plus [1] - 35:4 30305 [1] - 2:20 30th [1] - 47:9 33 [1] - 47:21 3333 [1] - 2:20 347 [1] - 36:5 35 [1] - 27:15 350 [4] - 60:4, 61:5, 61:17, 63:18 352 [3] - 36:4, 45:7, 45:8 38th [1] - 2:17 3:00 [1] - 72:20 3:59 [1] - 81:6	8 [1] - 54:17 800 [1] - 2:3		
00830263 [2] - 36:21, 40:9 04/09/2021 [1] - 81:14 07068 [1] - 1:14 08101 [1] - 1:8 08540 [1] - 3:4	300 [1] - 27:12 300-plus [1] - 35:4 30305 [1] - 2:20 30th [1] - 47:9 33 [1] - 47:21 3333 [1] - 2:20 347 [1] - 36:5 35 [1] - 27:15 350 [4] - 60:4, 61:5, 61:17, 63:18 352 [3] - 36:4, 45:7, 45:8 38th [1] - 2:17 3:00 [1] - 72:20 3:59 [1] - 81:6	9		
1	1 [1] - 54:13 10 [1] - 54:17 10,000 [11] - 45:15, 48:9, 48:24, 49:1, 49:6, 50:6, 51:12, 51:19, 52:1, 55:14, 60:18 103 [1] - 1:14 11 [2] - 28:13, 32:11 12-hour [1] - 71:7 128 [3] - 28:7, 28:14, 32:11 129 [1] - 28:25 14 [1] - 4:5 145,000 [3] - 47:15, 47:24, 47:25 15 [4] - 32:11, 41:21, 74:22, 79:12 15219 [1] - 2:17 16 [1] - 53:16 1638 [1] - 2:6 17 [2] - 42:4, 75:11 17th [1] - 2:12 1835 [1] - 1:17 19-md-02875-RBK- KMW [1] - 1:4 19103 [2] - 1:17, 2:13 19422 [1] - 2:24 1:00 [2] - 72:17, 73:7	9 [1] - 54:17 90 [2] - 27:14, 27:19 90277 [1] - 2:6 95 [1] - 34:14 9:00 [1] - 71:8 9th [5] - 46:25, 47:7, 47:14, 47:22, 54:6		
	4	A		
	4 [1] - 28:25 4,000 [1] - 36:14 400,000 [1] - 31:12 4200 [1] - 60:18 45 [1] - 68:1 450 [1] - 2:24 49 [1] - 57:25 4th [1] - 1:8	a.m [1] - 72:20 abide [1] - 72:10 ability [5] - 8:12, 31:1, 31:16, 41:5 able [13] - 4:22, 17:7, 18:24, 19:13, 19:15, 24:7, 39:12, 49:4, 55:25, 61:15, 62:21, 70:3, 80:11 above-entitled [1] - 81:10 ABRAHAM [4] - 3:3, 5:7, 5:10, 6:20 Abraham [1] - 5:9 absolutely [2] - 43:25, 72:19 abusing [1] - 72:21 accept [1] - 59:17 acceptable [4] - 12:5, 17:2, 56:6, 56:17 accommodation [1] - 58:11 accomplish [1] - 16:22 according [1] - 55:14 accuracy [8] - 7:13, 7:19, 9:5, 9:15, 9:16, 13:16, 16:8, 16:18 accurate [2] - 76:5, 76:13 accurately [1] - 6:11 achievable [1] - 61:15 achieve [1] - 8:11 Actavis [2] - 2:21, 2:22 ACTION [1] - 1:3 action [4] - 66:23, 67:2, 67:6, 68:9 actively [1] - 55:3 activities [1] - 37:6 Adam [7] - 5:24, 17:21, 32:8, 71:23,		
	5			
	5 [1] - 54:18 50 [18] - 48:21, 48:22, 49:8, 49:12, 49:16, 49:22, 50:7, 51:19, 51:22, 52:1, 52:13, 52:18, 52:21, 53:19, 54:15, 54:20, 55:20 50-page [1] - 58:1 500-page [1] - 72:25 55402 [1] - 2:3			
	6			
	600-page [1] - 73:22 609-774-1494 [1] - 1:23 67 [1] - 77:17 6:00 [2] - 71:9, 73:6			
	7			
	7 [1] - 1:9 70,000 [3] - 51:6, 51:7, 60:18 701 [1] - 1:20			
20 [4] - 8:15, 17:10, 17:13, 41:21 20,000 [1] - 40:24 2019 [1] - 57:18 2020 [2] - 66:19, 66:20 2021 [1] - 1:9 21 [1] - 3:4 2150 [1] - 2:3 220 [1] - 2:9 2500 [1] - 2:20 2705 [1] - 2:9 28 [7] - 27:22, 29:18, 29:20, 30:6, 31:12, 32:24, 33:18 2900 [1] - 1:17				

<p><b>arose</b> <sup>[1]</sup> - 46:15 <b>art</b> <sup>[2]</sup> - 12:7, 17:3 <b>assertion</b> <sup>[1]</sup> - 31:3 <b>assertions</b> <sup>[1]</sup> - 30:22 <b>assess</b> <sup>[1]</sup> - 38:13 <b>Assessment</b> <sup>[1]</sup> - 36:23 <b>assessment</b> <sup>[6]</sup> - 37:7, 38:7, 38:10, 38:11, 38:17, 39:20 <b>associated</b> <sup>[3]</sup> - 38:14, 38:19, 61:20 <b>assure</b> <sup>[1]</sup> - 64:25 <b>Atlanta</b> <sup>[1]</sup> - 2:20 <b>attachment</b> <sup>[11]</sup> - 42:5, 42:12, 42:21, 44:6, 58:5, 58:14, 58:16, 58:18, 59:3, 60:1, 61:21 <b>attachments</b> <sup>[29]</sup> - 41:5, 41:18, 41:21, 42:2, 42:4, 42:9, 42:10, 42:23, 43:2, 44:9, 45:1, 45:3, 55:5, 55:8, 55:12, 55:13, 55:15, 57:2, 57:20, 58:12, 59:1, 59:13, 59:15, 59:18, 59:19, 62:10, 62:21, 63:4 <b>attention</b> <sup>[2]</sup> - 70:13, 72:22 <b>Attorney</b> <sup>[1]</sup> - 3:5 <b>attorney</b> <sup>[1]</sup> - 28:9 <b>auditing</b> <sup>[1]</sup> - 40:18 <b>Aurobindo</b> <sup>[1]</sup> - 2:25 <b>Aurolife</b> <sup>[1]</sup> - 2:25 <b>Austin</b> <sup>[1]</sup> - 2:9 <b>authored</b> <sup>[2]</sup> - 64:15, 64:18 <b>available</b> <sup>[8]</sup> - 17:13, 24:2, 24:3, 24:20, 25:20, 66:5, 66:11, 66:15 <b>Avenue</b> <sup>[1]</sup> - 2:3 <b>Aviv</b> <sup>[1]</sup> - 73:7 <b>avoid</b> <sup>[1]</sup> - 58:10 <b>aware</b> <sup>[1]</sup> - 70:23 <b>awhile</b> <sup>[2]</sup> - 43:20, 55:6</p>	<p><b>basis</b> <sup>[6]</sup> - 10:1, 31:25, 42:12, 47:15, 49:10, 71:11 <b>Bates</b> <sup>[7]</sup> - 36:18, 36:20, 40:8, 41:17, 42:20, 61:18, 61:19 <b>Beach</b> <sup>[1]</sup> - 2:6 <b>beautifully</b> <sup>[1]</sup> - 47:20 <b>becomes</b> <sup>[4]</sup> - 12:18, 57:12, 70:19, 71:6 <b>bed</b> <sup>[1]</sup> - 75:10 <b>Bee</b> <sup>[1]</sup> - 2:9 <b>begin</b> <sup>[2]</sup> - 72:16, 73:6 <b>behalf</b> <sup>[5]</sup> - 40:11, 46:14, 62:6, 64:5, 77:1 <b>Behram</b> <sup>[1]</sup> - 57:3 <b>BEHRAM</b> <sup>[1]</sup> - 2:5 <b>Bell</b> <sup>[1]</sup> - 2:24 <b>benefit</b> <sup>[1]</sup> - 70:8 <b>benign</b> <sup>[1]</sup> - 41:2 <b>best</b> <sup>[6]</sup> - 4:11, 11:25, 16:22, 24:1, 43:11, 80:9 <b>better</b> <sup>[3]</sup> - 17:15, 60:2, 61:9 <b>between</b> <sup>[3]</sup> - 46:13, 53:18, 70:7 <b>beyond</b> <sup>[1]</sup> - 17:6 <b>bit</b> <sup>[2]</sup> - 29:5, 41:20 <b>biting</b> <sup>[1]</sup> - 43:7 <b>blank</b> <sup>[3]</sup> - 37:15, 43:25, 59:6 <b>bless</b> <sup>[1]</sup> - 55:18 <b>blessing</b> <sup>[1]</sup> - 56:3 <b>blind</b> <sup>[2]</sup> - 59:21, 61:4 <b>Blue</b> <sup>[1]</sup> - 2:24 <b>book</b> <sup>[1]</sup> - 31:10 <b>BOSICK</b> <sup>[1]</sup> - 2:15 <b>bottom</b> <sup>[1]</sup> - 57:14 <b>breaks</b> <sup>[1]</sup> - 11:15 <b>brief</b> <sup>[4]</sup> - 17:23, 18:14, 34:7, 38:2 <b>briefed</b> <sup>[1]</sup> - 27:8 <b>briefing</b> <sup>[3]</sup> - 29:6, 32:19, 67:4 <b>briefs</b> <sup>[2]</sup> - 4:23, 14:25 <b>bright</b> <sup>[3]</sup> - 74:19, 76:24, 77:9 <b>bright-line</b> <sup>[1]</sup> - 74:19 <b>bring</b> <sup>[2]</sup> - 4:18, 33:21 <b>broaden</b> <sup>[1]</sup> - 44:1 <b>brought</b> <sup>[2]</sup> - 47:16, 72:21 <b>bubbling</b> <sup>[1]</sup> - 64:12 <b>Building</b> <sup>[1]</sup> - 1:7 <b>bunch</b> <sup>[1]</sup> - 77:11 <b>burden</b> <sup>[5]</sup> - 49:5, 49:21, 55:16, 59:12, 62:8</p>	<p><b>burdened</b> <sup>[2]</sup> - 53:11, 53:12 <b>burdensome</b> <sup>[1]</sup> - 55:20 <b>business</b> <sup>[4]</sup> - 5:14, 19:4, 37:17, 45:17 <b>buy</b> <sup>[1]</sup> - 39:20 <b>BY</b> <sup>[10]</sup> - 1:13, 1:16, 1:19, 2:2, 2:5, 2:8, 2:11, 2:16, 2:19, 2:23 <b>bye</b> <sup>[2]</sup> - 81:4 <b>bye-bye</b> <sup>[1]</sup> - 81:4</p> <p style="text-align: center;"><b>C</b></p> <p><b>cache</b> <sup>[1]</sup> - 49:4 <b>California</b> <sup>[1]</sup> - 2:6 <b>Camden</b> <sup>[2]</sup> - 1:8, 19:15 <b>camera</b> <sup>[2]</sup> - 4:11, 49:17 <b>Camille</b> <sup>[2]</sup> - 1:22, 81:12 <b>camillepedano@gmail.com</b> <sup>[1]</sup> - 1:23 <b>Camp</b> <sup>[1]</sup> - 1:20 <b>cannot</b> <sup>[1]</sup> - 32:22 <b>cap</b> <sup>[1]</sup> - 50:7 <b>capabilities</b> <sup>[1]</sup> - 39:21 <b>capable</b> <sup>[1]</sup> - 14:3 <b>capacity</b> <sup>[1]</sup> - 61:12 <b>capping</b> <sup>[1]</sup> - 55:20 <b>captured</b> <sup>[1]</sup> - 6:11 <b>care</b> <sup>[2]</sup> - 19:10, 78:19 <b>cares</b> <sup>[1]</sup> - 74:19 <b>carry</b> <sup>[1]</sup> - 6:21 <b>case</b> <sup>[22]</sup> - 13:19, 16:25, 19:12, 29:23, 30:25, 31:7, 31:20, 32:1, 32:7, 33:20, 38:8, 41:17, 41:20, 44:4, 45:19, 53:15, 59:10, 61:24, 64:2, 70:23, 71:20, 77:23 <b>cases</b> <sup>[3]</sup> - 41:15, 70:25, 71:1 <b>categories</b> <sup>[3]</sup> - 18:18, 18:20, 48:2 <b>categorized</b> <sup>[1]</sup> - 34:15 <b>category</b> <sup>[2]</sup> - 18:23, 25:5 <b>CCR</b> <sup>[1]</sup> - 81:12 <b>central</b> <sup>[2]</sup> - 25:11, 38:8 <b>Centre</b> <sup>[1]</sup> - 2:17 <b>certain</b> <sup>[3]</sup> - 18:18, 31:4, 56:1 <b>certainly</b> <sup>[17]</sup> - 13:16,</p>	<p>14:17, 25:15, 26:15, 31:14, 31:18, 33:24, 35:9, 46:1, 56:11, 60:11, 60:25, 66:15, 67:5, 71:17, 71:21, 72:20 <b>certify</b> <sup>[1]</sup> - 81:9 <b>cetera</b> <sup>[1]</sup> - 26:19 <b>challenge</b> <sup>[6]</sup> - 49:9, 52:10, 52:18, 54:14, 62:14, 63:12 <b>challenging</b> <sup>[2]</sup> - 27:21, 52:7 <b>changing</b> <sup>[1]</sup> - 58:24 <b>characters</b> <sup>[1]</sup> - 11:15 <b>chase</b> <sup>[1]</sup> - 32:9 <b>checked</b> <sup>[1]</sup> - 46:9 <b>checklist</b> <sup>[6]</sup> - 39:2, 39:3, 41:3, 59:6, 59:24 <b>checkmarks</b> <sup>[1]</sup> - 37:2 <b>chime</b> <sup>[2]</sup> - 39:25, 40:15 <b>China</b> <sup>[4]</sup> - 28:9, 28:10, 28:11, 64:10 <b>Chinese</b> <sup>[32]</sup> - 11:15, 13:8, 15:23, 19:17, 19:20, 19:24, 23:8, 27:4, 27:13, 28:13, 28:23, 29:12, 29:19, 29:23, 30:11, 30:16, 30:18, 30:20, 30:21, 30:22, 30:23, 31:1, 31:2, 31:6, 31:14, 31:17, 31:18, 32:2, 32:12, 33:18, 65:2 <b>choose</b> <sup>[2]</sup> - 73:14, 73:20 <b>chose</b> <sup>[2]</sup> - 19:4, 23:24 <b>CIPRIANI</b> <sup>[1]</sup> - 2:23 <b>circumstances</b> <sup>[1]</sup> - 80:17 <b>cite</b> <sup>[1]</sup> - 54:25 <b>cited</b> <sup>[2]</sup> - 19:6, 77:22 <b>CIVIL</b> <sup>[1]</sup> - 1:3 <b>clarification</b> <sup>[4]</sup> - 18:2, 69:22, 73:6, 73:9 <b>clarify</b> <sup>[4]</sup> - 42:17, 42:19, 72:15, 75:18 <b>clear</b> <sup>[10]</sup> - 5:11, 22:7, 32:10, 50:17, 53:6, 54:7, 54:10, 66:16, 72:9, 72:10 <b>CLEM</b> <sup>[1]</sup> - 2:16 <b>Clem</b> <sup>[6]</sup> - 40:1, 43:8, 48:10, 51:22, 54:16 <b>Clerk</b> <sup>[1]</sup> - 3:9 <b>client</b> <sup>[2]</sup> - 51:9, 70:25 <b>clock</b> <sup>[25]</sup> - 72:3, 72:4, 73:10, 73:11, 73:15,</p>	<p>73:17, 73:23, 73:25, 74:10, 74:14, 75:3, 75:21, 75:23, 76:1, 76:2, 79:1, 79:14, 80:4, 80:7, 80:10, 80:12, 80:16, 80:18 <b>close</b> <sup>[1]</sup> - 12:7 <b>closely</b> <sup>[1]</sup> - 35:14 <b>Coast</b> <sup>[1]</sup> - 2:6 <b>coded</b> <sup>[2]</sup> - 37:24, 51:10 <b>Cohen</b> <sup>[1]</sup> - 1:7 <b>colleague</b> <sup>[1]</sup> - 35:5 <b>colleagues</b> <sup>[1]</sup> - 74:5 <b>collective</b> <sup>[1]</sup> - 60:22 <b>comfortable</b> <sup>[2]</sup> - 17:3, 35:11 <b>coming</b> <sup>[5]</sup> - 48:17, 62:16, 70:21, 74:8, 75:11 <b>Commencing</b> <sup>[1]</sup> - 1:9 <b>comments</b> <sup>[3]</sup> - 40:5, 54:6, 71:16 <b>communicated</b> <sup>[1]</sup> - 29:19 <b>communications</b> <sup>[1]</sup> - 19:5 <b>company</b> <sup>[2]</sup> - 19:4, 38:13 <b>compare</b> <sup>[1]</sup> - 9:15 <b>compel</b> <sup>[4]</sup> - 27:9, 27:24, 33:9, 42:8 <b>compelled</b> <sup>[1]</sup> - 56:20 <b>complete</b> <sup>[2]</sup> - 50:18, 63:23 <b>completed</b> <sup>[1]</sup> - 47:8 <b>completely</b> <sup>[4]</sup> - 10:10, 38:20, 61:5, 73:1 <b>completion</b> <sup>[2]</sup> - 7:17, 7:24 <b>compliance</b> <sup>[1]</sup> - 67:25 <b>comply</b> <sup>[4]</sup> - 66:22, 67:1, 68:4, 68:11 <b>compromise</b> <sup>[2]</sup> - 53:9, 60:15 <b>computer</b> <sup>[2]</sup> - 1:25, 59:9 <b>computer-aided</b> <sup>[1]</sup> - 1:25 <b>Computerized</b> <sup>[1]</sup> - 36:24 <b>computerized</b> <sup>[2]</sup> - 37:7, 39:19 <b>conceded</b> <sup>[1]</sup> - 27:20 <b>conceptionally</b> <sup>[1]</sup> - 52:3 <b>conceptually</b> <sup>[1]</sup> - 55:22</p>
<b>B</b>				
<p><b>back-end</b> <sup>[1]</sup> - 11:10 <b>balance</b> <sup>[1]</sup> - 54:11 <b>ball</b> <sup>[1]</sup> - 45:5 <b>bank</b> <sup>[1]</sup> - 47:22 <b>based</b> <sup>[9]</sup> - 9:24, 28:9, 30:18, 30:22, 31:6, 35:17, 38:1, 45:9, 66:18</p>				

<p><b>concern</b> <sup>[15]</sup> - 6:6, 13:24, 14:16, 14:19, 15:7, 15:18, 15:20, 18:6, 19:10, 20:2, 20:22, 22:25, 30:15, 60:10, 65:4</p> <p><b>concerned</b> <sup>[7]</sup> - 4:9, 9:5, 24:19, 28:22, 49:3, 57:14, 64:23</p> <p><b>concerning</b> <sup>[3]</sup> - 23:17, 30:23, 31:9</p> <p><b>concerns</b> <sup>[4]</sup> - 13:23, 17:23, 26:16, 74:18</p> <p><b>conclude</b> <sup>[1]</sup> - 55:21</p> <p><b>concluded</b> <sup>[1]</sup> - 81:6</p> <p><b>conclusions</b> <sup>[1]</sup> - 34:17</p> <p><b>conduct</b> <sup>[2]</sup> - 4:11, 20:20</p> <p><b>conducting</b> <sup>[1]</sup> - 39:19</p> <p><b>confer</b> <sup>[14]</sup> - 27:15, 27:16, 27:17, 27:21, 28:3, 32:17, 47:18, 49:14, 52:5, 55:25, 56:5, 58:4, 59:14, 63:1</p> <p><b>conference</b> <sup>[5]</sup> - 4:4, 6:15, 50:24, 66:14, 66:17</p> <p><b>CONFERENCE</b> <sup>[1]</sup> - 1:5</p> <p><b>conferred</b> <sup>[2]</sup> - 30:20, 33:1</p> <p><b>confidential</b> <sup>[3]</sup> - 13:18, 16:6, 16:20</p> <p><b>confidentiality</b> <sup>[4]</sup> - 15:14, 16:25, 26:8, 27:3</p> <p><b>confines</b> <sup>[1]</sup> - 67:11</p> <p><b>confused</b> <sup>[1]</sup> - 52:12</p> <p><b>connected</b> <sup>[1]</sup> - 55:8</p> <p><b>connection</b> <sup>[1]</sup> - 33:20</p> <p><b>consider</b> <sup>[5]</sup> - 18:19, 28:20, 29:1, 29:18, 31:22</p> <p><b>consideration</b> <sup>[2]</sup> - 31:15, 56:12</p> <p><b>considerations</b> <sup>[1]</sup> - 15:8</p> <p><b>considered</b> <sup>[1]</sup> - 29:3</p> <p><b>considering</b> <sup>[2]</sup> - 29:4, 60:14</p> <p><b>consternation</b> <sup>[1]</sup> - 32:18</p> <p><b>consult</b> <sup>[1]</sup> - 31:16</p> <p><b>consuming</b> <sup>[1]</sup> - 62:13</p> <p><b>contain</b> <sup>[1]</sup> - 37:19</p> <p><b>contemplates</b> <sup>[1]</sup> - 68:3</p> <p><b>contentious</b> <sup>[1]</sup> - 74:5</p>	<p><b>context</b> <sup>[14]</sup> - 17:12, 17:16, 33:1, 41:9, 43:3, 55:11, 59:2, 61:4, 61:6, 61:17, 62:17, 70:6, 71:14, 76:7</p> <p><b>continue</b> <sup>[1]</sup> - 63:20</p> <p><b>Continued</b> <sup>[2]</sup> - 2:1, 3:1</p> <p><b>continued</b> <sup>[2]</sup> - 47:11, 76:21</p> <p><b>contracts</b> <sup>[1]</sup> - 25:2</p> <p><b>control</b> <sup>[2]</sup> - 27:19, 27:20</p> <p><b>convenience</b> <sup>[7]</sup> - 19:17, 19:21, 21:13, 23:2, 23:24, 24:4, 58:9</p> <p><b>convenient</b> <sup>[1]</sup> - 23:21</p> <p><b>Convention</b> <sup>[2]</sup> - 67:15, 68:4</p> <p><b>conversation</b> <sup>[1]</sup> - 59:21</p> <p><b>conveys</b> <sup>[1]</sup> - 48:11</p> <p><b>Cooper</b> <sup>[1]</sup> - 1:8</p> <p><b>cooperation</b> <sup>[1]</sup> - 8:5</p> <p><b>cooperative</b> <sup>[1]</sup> - 29:17</p> <p><b>cooperatively</b> <sup>[1]</sup> - 65:12</p> <p><b>corporate</b> <sup>[3]</sup> - 18:23, 21:8, 70:24</p> <p><b>correct</b> <sup>[10]</sup> - 9:13, 10:23, 10:24, 25:4, 39:4, 57:2, 60:7, 66:4, 67:23, 81:9</p> <p><b>correctly</b> <sup>[2]</sup> - 14:10, 20:19</p> <p><b>correspondence</b> <sup>[1]</sup> - 27:11</p> <p><b>corresponds</b> <sup>[1]</sup> - 11:20</p> <p><b>cost</b> <sup>[6]</sup> - 9:25, 10:23, 12:23, 12:25, 13:2, 16:12</p> <p><b>costs</b> <sup>[2]</sup> - 14:8, 33:23</p> <p><b>counsel</b> <sup>[19]</sup> - 23:18, 27:13, 29:19, 29:23, 30:16, 30:21, 31:6, 31:14, 32:12, 33:18, 45:10, 48:6, 56:12, 56:16, 59:14, 64:12, 73:2, 78:23, 80:17</p> <p><b>counsel's</b> <sup>[1]</sup> - 74:18</p> <p><b>count</b> <sup>[1]</sup> - 70:11</p> <p><b>couple</b> <sup>[5]</sup> - 4:4, 4:14, 4:24, 17:23, 47:19</p> <p><b>course</b> <sup>[11]</sup> - 7:20, 18:25, 23:18, 25:10, 37:17, 39:9, 63:1,</p>	<p>66:22, 67:1, 67:6, 68:8</p> <p><b>COURT</b> <sup>[3]</sup> - 1:1, 66:11, 75:17</p> <p><b>court</b> <sup>[4]</sup> - 45:16, 50:18, 65:8, 68:9</p> <p><b>Court</b> <sup>[32]</sup> - 1:22, 7:18, 7:20, 9:23, 27:2, 29:3, 31:8, 31:21, 35:6, 43:24, 45:5, 45:9, 45:19, 48:2, 48:5, 48:19, 49:17, 50:5, 50:25, 51:1, 51:13, 55:17, 61:1, 63:11, 64:8, 66:20, 67:4, 68:2, 68:6, 70:9, 77:21, 81:12</p> <p><b>Court's</b> <sup>[6]</sup> - 35:9, 47:23, 47:24, 60:10, 70:6, 72:22</p> <p><b>court-approved</b> <sup>[1]</sup> - 68:9</p> <p><b>Courthouse</b> <sup>[1]</sup> - 1:7</p> <p><b>Courtroom</b> <sup>[1]</sup> - 3:10</p> <p><b>courtroom</b> <sup>[1]</sup> - 23:15</p> <p><b>Cove</b> <sup>[1]</sup> - 2:9</p> <p><b>cover</b> <sup>[1]</sup> - 6:10</p> <p><b>covered</b> <sup>[3]</sup> - 64:1, 67:21, 68:22</p> <p><b>covers</b> <sup>[1]</sup> - 64:1</p> <p><b>CRC</b> <sup>[1]</sup> - 81:12</p> <p><b>create</b> <sup>[3]</sup> - 15:18, 48:19, 76:22</p> <p><b>criteria</b> <sup>[1]</sup> - 39:8</p> <p><b>CRR</b> <sup>[1]</sup> - 81:12</p> <p><b>crucial</b> <sup>[1]</sup> - 52:20</p> <p><b>current</b> <sup>[1]</sup> - 60:20</p> <p><b>custodial</b> <sup>[3]</sup> - 18:22, 24:23, 25:4</p> <p><b>custodian</b> <sup>[2]</sup> - 49:7, 54:4</p> <p><b>custodians</b> <sup>[2]</sup> - 48:22, 52:22</p> <p><b>customary</b> <sup>[1]</sup> - 42:25</p> <p><b>cut</b> <sup>[2]</sup> - 32:9, 53:5</p>	<p><b>days</b> <sup>[9]</sup> - 45:16, 45:18, 49:14, 53:20, 54:15, 55:19, 71:1, 79:4</p> <p><b>de</b> <sup>[1]</sup> - 15:9</p> <p><b>de-designate</b> <sup>[1]</sup> - 15:9</p> <p><b>deadline</b> <sup>[1]</sup> - 50:20</p> <p><b>deadlines</b> <sup>[2]</sup> - 50:5, 67:6</p> <p><b>deal</b> <sup>[2]</sup> - 48:7, 76:7</p> <p><b>dealing</b> <sup>[3]</sup> - 63:2, 63:8, 63:9</p> <p><b>dealings</b> <sup>[1]</sup> - 57:7</p> <p><b>December</b> <sup>[7]</sup> - 46:25, 47:7, 47:14, 47:21, 51:1, 54:6, 55:1</p> <p><b>decide</b> <sup>[4]</sup> - 16:24, 23:4, 45:10, 70:21</p> <p><b>decided</b> <sup>[3]</sup> - 22:3, 22:5, 23:11</p> <p><b>decision</b> <sup>[4]</sup> - 4:7, 17:1, 26:9, 30:10</p> <p><b>Defendant</b> <sup>[1]</sup> - 2:18</p> <p><b>defendant</b> <sup>[1]</sup> - 49:12</p> <p><b>defendants</b> <sup>[16]</sup> - 44:25, 47:8, 48:21, 49:21, 51:21, 53:8, 54:15, 55:20, 55:24, 56:10, 57:12, 57:14, 58:10, 58:16, 62:11</p> <p><b>Defendants</b> <sup>[4]</sup> - 2:13, 2:21, 2:25, 3:5</p> <p><b>defendants'</b> <sup>[1]</sup> - 70:14</p> <p><b>defense</b> <sup>[19]</sup> - 6:24, 15:20, 17:5, 22:11, 22:20, 23:18, 34:11, 56:1, 56:5, 56:7, 56:11, 56:16, 59:14, 60:15, 60:21, 72:6, 74:6, 74:18, 75:1</p> <p><b>defer</b> <sup>[2]</sup> - 5:14, 35:7</p> <p><b>definitely</b> <sup>[2]</sup> - 7:18, 13:25</p> <p><b>definition</b> <sup>[1]</sup> - 42:4</p> <p><b>delay</b> <sup>[1]</sup> - 75:6</p> <p><b>demonstrative</b> <sup>[1]</sup> - 40:12</p> <p><b>depose</b> <sup>[1]</sup> - 49:2</p> <p><b>deposed</b> <sup>[6]</sup> - 4:20, 8:7, 48:23, 76:15, 79:8, 79:9</p> <p><b>deposition</b> <sup>[31]</sup> - 13:7, 53:16, 62:17, 62:20, 64:9, 65:12, 70:12, 70:21, 71:3, 71:6, 71:7, 71:10, 72:16, 72:17, 72:23, 73:4, 74:5, 74:7, 74:15,</p>	<p>74:22, 74:25, 76:12, 76:13, 76:18, 79:6, 79:19, 79:20, 80:9</p> <p><b>depositions</b> <sup>[21]</sup> - 7:12, 7:16, 7:17, 7:24, 15:25, 17:19, 20:21, 54:3, 55:3, 62:17, 65:19, 70:4, 70:14, 70:24, 71:8, 71:18, 71:19, 74:6, 74:24, 75:13, 78:12</p> <p><b>Deputy</b> <sup>[1]</sup> - 3:10</p> <p><b>Derrick</b> <sup>[1]</sup> - 53:16</p> <p><b>describe</b> <sup>[2]</sup> - 34:8, 36:17</p> <p><b>describing</b> <sup>[1]</sup> - 58:25</p> <p><b>description</b> <sup>[2]</sup> - 34:7, 38:2</p> <p><b>designate</b> <sup>[4]</sup> - 15:9, 23:16, 23:24, 36:8</p> <p><b>designated</b> <sup>[7]</sup> - 15:9, 16:5, 16:19, 24:16, 25:12, 25:17, 45:15</p> <p><b>designations</b> <sup>[2]</sup> - 16:25, 26:8</p> <p><b>detail</b> <sup>[2]</sup> - 52:3, 72:2</p> <p><b>determination</b> <sup>[3]</sup> - 7:22, 32:23, 34:13</p> <p><b>determinations</b> <sup>[1]</sup> - 30:18</p> <p><b>determined</b> <sup>[1]</sup> - 31:5</p> <p><b>determining</b> <sup>[1]</sup> - 34:5</p> <p><b>devil's</b> <sup>[1]</sup> - 52:2</p> <p><b>devise</b> <sup>[1]</sup> - 49:19</p> <p><b>dialogue</b> <sup>[1]</sup> - 33:17</p> <p><b>different</b> <sup>[7]</sup> - 8:25, 21:2, 21:3, 58:18, 67:12, 72:6</p> <p><b>differently</b> <sup>[1]</sup> - 10:10</p> <p><b>differing</b> <sup>[1]</sup> - 32:3</p> <p><b>difficult</b> <sup>[3]</sup> - 12:17, 41:22, 43:14</p> <p><b>difficulties</b> <sup>[1]</sup> - 41:19</p> <p><b>difficulty</b> <sup>[1]</sup> - 62:12</p> <p><b>digest</b> <sup>[1]</sup> - 50:15</p> <p><b>diligent</b> <sup>[1]</sup> - 29:17</p> <p><b>diligently</b> <sup>[1]</sup> - 27:13</p> <p><b>directed</b> <sup>[1]</sup> - 7:7</p> <p><b>directly</b> <sup>[2]</sup> - 46:9, 58:17</p> <p><b>disappointed</b> <sup>[2]</sup> - 28:2, 29:2</p> <p><b>discontinuing</b> <sup>[1]</sup> - 50:21</p> <p><b>discoverable</b> <sup>[1]</sup> - 55:10</p> <p><b>discovering</b> <sup>[1]</sup> - 55:4</p> <p><b>discovery</b> <sup>[8]</sup> - 4:6, 44:13, 44:22, 47:8, 57:23, 58:7, 58:17,</p>
<b>D</b>				
<p><b>data</b> <sup>[1]</sup> - 13:13</p> <p><b>Date</b> <sup>[1]</sup> - 81:14</p> <p><b>date</b> <sup>[1]</sup> - 23:6</p> <p><b>Davis</b> <sup>[16]</sup> - 35:13, 37:25, 38:5, 40:7, 42:14, 42:18, 44:5, 44:19, 45:2, 45:24, 55:4, 61:20, 62:24, 63:15, 79:3, 80:2</p> <p><b>DAVIS</b> <sup>[11]</sup> - 2:8, 2:8, 2:19, 40:7, 41:13, 42:17, 42:19, 44:17, 45:23, 62:24, 79:2</p>				

<p>71:20 <b>discuss</b> [2] - 6:3, 36:12 <b>discussed</b> [5] - 27:16, 29:23, 62:8, 66:17, 72:25 <b>discussion</b> [8] - 10:7, 15:1, 16:21, 28:10, 32:12, 44:2, 63:16, 70:7 <b>displayed</b> [1] - 20:17 <b>displaying</b> [1] - 8:10 <b>disposal</b> [1] - 54:3 <b>disposition</b> [1] - 4:7 <b>dispute</b> [10] - 27:22, 29:19, 29:21, 33:4, 33:6, 33:19, 48:25, 50:8, 55:18, 74:15 <b>disputed</b> [5] - 33:19, 49:6, 49:16, 54:19, 55:7 <b>disputes</b> [4] - 26:25, 44:22, 49:20, 53:25 <b>disrespect</b> [1] - 52:7 <b>disruptive</b> [2] - 72:22, 73:5 <b>distribution</b> [1] - 37:5 <b>DISTRICT</b> [2] - 1:1, 1:1 <b>disturbed</b> [1] - 46:5 <b>docket</b> [1] - 26:18 <b>dockets</b> [1] - 46:10 <b>Docs</b> [1] - 16:6 <b>Document</b> [1] - 54:16 <b>document</b> [144] - 4:22, 7:20, 8:8, 8:9, 8:13, 8:14, 8:15, 8:18, 9:5, 9:19, 11:4, 11:7, 11:20, 11:22, 12:10, 13:3, 13:4, 13:12, 13:14, 14:4, 14:5, 14:10, 14:12, 15:19, 17:10, 17:11, 17:12, 17:25, 18:3, 19:16, 19:17, 20:17, 20:18, 21:2, 21:7, 21:8, 21:11, 21:12, 21:15, 21:16, 23:3, 23:7, 23:8, 23:19, 24:2, 24:5, 24:7, 24:17, 24:20, 24:25, 25:11, 25:12, 25:16, 25:18, 27:17, 28:9, 28:12, 33:2, 34:5, 34:8, 34:10, 34:12, 36:17, 36:19, 36:22, 36:24, 37:3, 37:9, 37:10, 37:13, 37:18, 37:23, 38:1, 38:3, 38:16, 39:1, 39:17, 39:18,</p>	<p>40:3, 40:12, 41:4, 41:14, 41:16, 41:23, 42:1, 42:22, 43:3, 46:15, 46:17, 46:19, 46:20, 49:9, 50:6, 50:18, 53:10, 54:8, 55:9, 55:11, 58:7, 58:20, 59:2, 59:4, 59:7, 59:8, 61:21, 61:23, 70:9, 70:16, 71:5, 71:13, 72:3, 73:3, 73:10, 73:12, 73:15, 73:16, 73:24, 74:10, 75:23, 75:24, 76:19, 77:2, 77:3, 77:6, 77:16, 78:11, 79:1, 79:13, 79:16, 79:23, 80:4, 80:5, 80:6, 80:12, 80:15, 80:18 <b>document's</b> [2] - 19:13, 19:14 <b>documentation</b> [1] - 37:5 <b>documents</b> [180] - 4:9, 4:12, 4:16, 4:19, 5:2, 5:3, 7:11, 7:16, 8:2, 8:4, 8:6, 9:3, 10:1, 10:15, 11:5, 12:7, 12:11, 12:13, 12:24, 13:1, 13:6, 13:18, 15:3, 15:6, 15:9, 15:11, 15:13, 15:16, 15:22, 15:24, 16:5, 16:7, 16:14, 16:15, 16:19, 17:7, 18:12, 18:18, 18:21, 18:23, 19:3, 19:5, 22:12, 24:12, 24:13, 24:14, 24:19, 24:22, 25:3, 25:5, 26:18, 27:10, 27:12, 27:14, 27:16, 27:20, 27:22, 27:24, 28:8, 28:10, 29:8, 29:12, 29:18, 29:20, 29:24, 30:6, 30:11, 30:17, 31:3, 31:4, 31:5, 31:11, 32:24, 32:25, 33:17, 33:19, 33:22, 34:1, 34:2, 34:7, 34:8, 34:13, 34:15, 34:21, 35:4, 35:6, 35:7, 35:17, 35:18, 35:24, 36:4, 36:8, 36:14, 40:14, 40:24, 41:2, 41:7, 41:20, 41:24, 42:11, 44:12, 44:13, 45:7, 45:8, 45:15, 47:12, 47:15, 47:24, 47:25, 48:9, 48:15, 48:18,</p>	<p>48:21, 48:22, 48:24, 49:4, 49:8, 49:11, 49:12, 49:16, 49:22, 50:2, 50:8, 51:3, 51:6, 51:8, 51:19, 51:22, 52:8, 52:13, 52:14, 52:17, 52:20, 53:19, 54:4, 54:13, 54:14, 54:19, 55:7, 55:14, 55:15, 55:20, 56:25, 57:11, 57:12, 57:21, 58:25, 59:20, 59:22, 59:23, 59:24, 60:4, 60:18, 61:5, 61:9, 61:17, 61:19, 62:9, 62:14, 62:19, 63:2, 63:5, 63:6, 63:10, 63:19, 64:7, 64:14, 64:16, 70:8, 70:16, 75:22, 79:11, 79:14, 79:21 <b>dog</b> [2] - 43:17, 43:22 <b>dollars</b> [1] - 44:13 <b>done</b> [13] - 8:16, 14:5, 14:6, 29:14, 31:8, 31:10, 32:17, 32:22, 33:2, 45:10, 71:10, 77:5, 77:6 <b>Dong</b> [1] - 74:25 <b>doubt</b> [2] - 51:1, 74:6 <b>down</b> [8] - 7:21, 15:7, 20:10, 23:18, 27:15, 29:18, 40:23, 61:13 <b>download</b> [1] - 12:15 <b>dozens</b> [1] - 79:8 <b>Dr</b> [6] - 79:6, 79:7, 79:10, 79:11, 79:12, 79:22 <b>drafted</b> [1] - 64:14 <b>drafts</b> [1] - 66:19 <b>dropped</b> [1] - 78:19 <b>drug</b> [2] - 58:18, 58:22 <b>Drugs</b> [1] - 3:5 <b>DUANE</b> [1] - 2:11 <b>due</b> [1] - 77:13 <b>duplicate</b> [1] - 15:4 <b>duplicates</b> [2] - 27:18, 27:19 <b>during</b> [6] - 7:11, 27:20, 32:17, 66:17, 74:7, 76:17 <b>dwelt</b> [1] - 50:2</p>	<p><b>efficient</b> [1] - 15:5 <b>effort</b> [1] - 16:21 <b>Eisenhower</b> [1] - 1:14 <b>either</b> [8] - 11:10, 49:13, 49:15, 54:19, 59:17, 64:2, 65:21, 77:10 <b>email</b> [23] - 41:5, 41:15, 41:18, 42:1, 42:5, 42:9, 42:12, 42:21, 43:1, 43:2, 44:9, 45:3, 57:20, 58:13, 59:1, 59:3, 59:13, 60:1, 60:2, 61:21, 63:12 <b>email's</b> [2] - 44:6, 59:18 <b>emails</b> [8] - 24:23, 41:21, 45:1, 55:4, 61:10, 62:19, 62:20, 63:4 <b>employ</b> [2] - 38:18, 39:8 <b>employed</b> [1] - 73:9 <b>encourage</b> [1] - 56:11 <b>end</b> [9] - 11:10, 19:22, 28:7, 53:18, 54:23, 63:10, 71:8, 74:24, 78:20 <b>ended</b> [2] - 28:3, 36:5 <b>ending</b> [1] - 6:6 <b>engaged</b> [3] - 40:23, 58:3, 59:14 <b>engaging</b> [2] - 62:11, 62:22 <b>English</b> [48] - 4:16, 4:20, 4:21, 4:22, 5:1, 8:3, 8:14, 11:16, 11:20, 12:12, 13:4, 15:6, 15:12, 17:7, 18:21, 19:3, 19:14, 19:15, 19:20, 19:24, 20:18, 21:7, 21:11, 21:17, 22:15, 22:18, 22:21, 24:3, 24:5, 24:16, 24:24, 25:3, 25:9, 25:13, 25:17, 25:18, 25:20, 64:6, 64:11, 64:15, 65:1, 65:3, 70:15, 76:8, 76:16 <b>English-speaking</b> [2] - 70:15, 76:8 <b>enter</b> [1] - 46:18 <b>entered</b> [2] - 44:8, 46:8 <b>entire</b> [10] - 8:18, 15:23, 17:10, 17:12, 23:17, 23:22, 32:7, 46:17, 80:5, 80:15</p>	<p><b>entirely</b> [2] - 5:11, 72:22 <b>entirety</b> [2] - 12:18, 30:12 <b>entities</b> [1] - 57:17 <b>entitled</b> [6] - 52:9, 70:12, 70:22, 71:13, 72:19, 81:10 <b>ergo</b> [1] - 42:22 <b>Eric</b> [2] - 74:25, 76:15 <b>ERIC</b> [1] - 3:3 <b>error</b> [2] - 46:3, 51:10 <b>ESI</b> [11] - 10:7, 42:24, 44:13, 45:12, 45:13, 51:2, 51:24, 57:1, 57:6, 57:19 <b>especially</b> [3] - 9:19, 20:11, 32:4 <b>ESQUIRE</b> [13] - 1:13, 1:16, 1:19, 2:2, 2:5, 2:8, 2:12, 2:16, 2:16, 2:19, 2:23, 3:3, 3:3 <b>Esquire</b> [1] - 3:9 <b>essence</b> [2] - 47:17, 49:13 <b>essentially</b> [3] - 11:14, 15:21, 72:7 <b>estimate</b> [1] - 10:23 <b>et</b> [1] - 26:19 <b>evaluate</b> [4] - 39:12, 39:19, 59:8, 61:9 <b>evaluating</b> [1] - 38:18 <b>evening</b> [1] - 81:1 <b>event</b> [1] - 65:7 <b>evidential</b> [1] - 21:16 <b>evidentiary</b> [1] - 22:4 <b>evolved</b> [1] - 58:24 <b>exact</b> [2] - 45:20, 51:4 <b>exactly</b> [4] - 20:22, 37:21, 41:15, 77:14 <b>examination</b> [1] - 54:9 <b>examine</b> [1] - 49:5 <b>examining</b> [1] - 24:13 <b>example</b> [15] - 13:5, 21:7, 21:9, 25:8, 26:17, 37:3, 38:16, 41:22, 42:1, 48:24, 54:25, 55:13, 61:10 <b>examples</b> [1] - 48:2 <b>exceed</b> [7] - 48:21, 49:12, 49:16, 52:18, 52:20, 54:15, 54:20 <b>exceeding</b> [1] - 49:22 <b>Excel</b> [2] - 58:1, 58:2 <b>except</b> [1] - 14:19 <b>exception</b> [1] - 64:7 <b>exchanging</b> [1] - 66:19 <b>exercise</b> [4] - 23:17, 23:22, 60:11, 60:23</p>
<b>E</b>				
<p><b>early</b> [2] - 40:17, 47:13 <b>easier</b> [2] - 26:16, 47:5 <b>Eastern</b> [1] - 73:7 <b>educated</b> [1] - 76:16 <b>effect</b> [2] - 18:14, 46:16</p>				



<b>exercises</b> [1] - 71:20 <b>Exhibit</b> [1] - 77:16 <b>exhibit</b> [2] - 72:19, 72:24 <b>exhibits</b> [1] - 62:20 <b>exist</b> [2] - 19:3, 25:3 <b>existed</b> [1] - 38:13 <b>exists</b> [3] - 8:8, 23:20, 38:8 <b>expect</b> [7] - 6:15, 8:15, 16:20, 17:10, 17:13, 17:18, 33:22 <b>expected</b> [1] - 5:11 <b>expecting</b> [1] - 66:5 <b>expedite</b> [3] - 16:22, 62:16, 67:5 <b>expedited</b> [4] - 62:21, 65:21, 67:5, 69:13 <b>expedition</b> [1] - 57:15 <b>expense</b> [1] - 51:8 <b>experienced</b> [1] - 41:19 <b>expert</b> [2] - 31:16, 31:23 <b>experts</b> [5] - 32:2, 32:3, 33:7, 50:3 <b>explain</b> [2] - 19:1, 19:2 <b>explained</b> [1] - 19:9 <b>explanation</b> [1] - 34:9 <b>explicit</b> [1] - 4:4 <b>explicitly</b> [2] - 4:8, 68:3 <b>express</b> [1] - 30:15 <b>extending</b> [1] - 50:20 <b>extent</b> [6] - 8:2, 16:16, 33:20, 48:11, 62:18, 66:21 <b>extra</b> [1] - 14:7 <b>extracted</b> [5] - 11:6, 11:17, 14:4, 14:6, 15:22 <b>eyes</b> [1] - 44:12	23:2, 55:25, 66:9 <b>faith</b> [1] - 31:25 <b>faithful</b> [1] - 21:1 <b>fall</b> [5] - 30:12, 55:17, 60:17, 61:11, 66:19 <b>falls</b> [1] - 54:13 <b>familiar</b> [1] - 35:6 <b>familiarity</b> [2] - 25:19, 37:8 <b>families</b> [1] - 63:4 <b>family</b> [2] - 61:13, 63:6 <b>far</b> [4] - 24:18, 43:23, 53:11, 53:14 <b>fashion</b> [1] - 10:11 <b>FDA</b> [5] - 19:5, 24:12, 24:13, 24:14, 24:19 <b>felt</b> [1] - 41:1 <b>Ferretti</b> [4] - 46:8, 46:14, 57:7, 58:3 <b>few</b> [6] - 12:21, 27:1, 30:19, 35:18, 69:25, 76:17 <b>fight</b> [2] - 26:14, 74:22 <b>figure</b> [2] - 16:21, 48:1 <b>figuring</b> [1] - 49:1 <b>file</b> [13] - 18:22, 24:24, 25:4, 25:18, 30:1, 30:5, 33:9, 40:19, 40:21, 66:23, 67:2, 68:10, 69:3 <b>filed</b> [2] - 65:17, 66:8 <b>filing</b> [3] - 69:1, 69:3, 69:9 <b>fine</b> [9] - 7:12, 40:4, 52:3, 56:23, 66:14, 67:4, 68:7, 69:14 <b>finish</b> [1] - 78:7 <b>finished</b> [1] - 28:25 <b>first</b> [13] - 4:25, 5:6, 8:2, 20:6, 26:11, 26:12, 34:19, 36:19, 37:4, 45:25, 47:2, 47:7, 51:10 <b>fishing</b> [1] - 57:15 <b>fit</b> [1] - 35:22 <b>five</b> [7] - 36:6, 36:8, 54:12, 55:19, 71:1, 73:14, 73:24 <b>five-day</b> [1] - 54:12 <b>five-page</b> [1] - 73:24 <b>flag</b> [1] - 66:10 <b>flat</b> [1] - 43:1 <b>flexibility</b> [1] - 22:19 <b>flip</b> [1] - 73:22 <b>Floor</b> [1] - 2:17 <b>fluent</b> [2] - 4:21, 76:16 <b>follow</b> [2] - 10:10, 80:13 <b>followed</b> [1] - 27:17 <b>following</b> [2] - 45:9,	45:12 <b>FOR</b> [1] - 1:1 <b>foreclosing</b> [1] - 22:21 <b>foregoing</b> [1] - 81:9 <b>foreign</b> [3] - 16:16, 24:18, 31:21 <b>forget</b> [2] - 45:11, 45:12 <b>form</b> [6] - 36:24, 36:25, 37:2, 37:15, 38:11, 43:25 <b>format</b> [4] - 12:12, 13:1, 14:4, 38:9 <b>formatted</b> [4] - 10:9, 13:4, 13:14, 14:10 <b>formatting</b> [2] - 11:24, 12:22 <b>forth</b> [1] - 66:19 <b>forward</b> [12] - 17:19, 45:20, 47:5, 60:23, 63:17, 65:12, 69:12, 70:4, 76:25, 77:24, 80:3, 80:21 <b>four</b> [1] - 66:1 <b>four-to-six-month</b> [1] - 66:1 <b>frame</b> [1] - 47:4 <b>frames</b> [1] - 47:20 <b>framework</b> [1] - 48:6 <b>FRANK</b> [1] - 2:16 <b>Frank</b> [2] - 35:5, 43:6 <b>frankly</b> [2] - 46:6, 72:5 <b>free</b> [3] - 14:17, 16:13, 61:14 <b>FREEMAN</b> [1] - 1:13 <b>Friday</b> [14] - 45:15, 48:6, 51:13, 65:22, 66:6, 66:12, 66:15, 68:7, 68:15, 68:18, 68:24, 69:1, 69:5, 69:12 <b>frivolous</b> [1] - 33:21 <b>front</b> [7] - 17:24, 18:7, 30:10, 38:1, 38:16, 39:12, 39:17 <b>frustrating</b> [1] - 43:13 <b>full</b> [2] - 48:5, 49:4 <b>fully</b> [2] - 41:5, 46:19 <b>function</b> [1] - 12:23 <b>fundamental</b> [2] - 57:11, 58:19	71:20 <b>glad</b> [2] - 63:16, 65:11 <b>global</b> [1] - 51:15 <b>globally</b> [1] - 56:2 <b>Glover</b> [2] - 53:16, 79:4 <b>Goldberg</b> [34] - 6:11, 7:9, 8:21, 10:18, 10:21, 11:21, 12:3, 12:20, 14:7, 14:14, 14:20, 16:4, 16:8, 18:10, 20:4, 20:15, 21:25, 26:5, 26:21, 28:25, 29:15, 32:1, 32:22, 33:7, 33:11, 64:20, 64:21, 64:22, 65:6, 75:16, 75:17, 76:12, 76:21, 77:25 <b>GOLDBERG</b> [28] - 2:11, 7:10, 8:20, 8:22, 9:13, 9:22, 10:24, 12:21, 18:11, 20:5, 22:1, 22:23, 23:1, 23:10, 26:4, 26:23, 27:6, 29:16, 30:14, 33:13, 64:19, 64:21, 75:16, 75:18, 76:2, 76:4, 76:6, 81:5 <b>Goldberg's</b> [2] - 10:14, 23:13 <b>GOLDENBERG</b> [9] - 2:2, 2:2, 5:19, 65:14, 66:8, 67:9, 67:16, 68:19, 69:8 <b>Goldenberg</b> [4] - 5:17, 65:15, 66:4, 67:8 <b>GOLOMB</b> [1] - 1:16 <b>good-faith</b> [1] - 31:25 <b>Google</b> [2] - 7:5, 8:24, 9:3, 9:4, 9:14, 9:18, 11:10, 12:1, 12:5, 12:8, 12:14, 13:15, 13:19, 14:2, 14:12, 14:18, 16:6, 16:13, 17:3, 17:4 <b>GORDON</b> [1] - 2:15 <b>gospel</b> [1] - 31:20 <b>government</b> [4] - 28:13, 28:16, 28:23, 29:12 <b>grasping</b> [1] - 23:13 <b>great</b> [5] - 24:9, 49:21, 53:1, 80:22 <b>greatly</b> [1] - 61:3 <b>GREENBERG</b> [1] - 2:19 <b>group</b> [5] - 41:11, 56:1, 56:5, 56:7, 60:21	<b>groups</b> [2] - 63:6, 63:13 <b>Gu</b> [2] - 74:25, 76:15 <b>guess</b> [7] - 20:25, 25:3, 26:20, 30:2, 52:2, 55:21, 75:9 <b>guidance</b> [5] - 4:10, 34:3, 71:15, 77:21, 80:20 <b>guided</b> [1] - 31:2 <b>GxP</b> [3] - 36:24, 36:25, 37:6 <b>GxP-related</b> [1] - 37:6
<b>F</b>	<b>fabricating</b> [1] - 39:9 <b>fabrication</b> [1] - 38:14 <b>face</b> [3] - 59:4, 60:5, 61:23 <b>facilitate</b> [2] - 7:17, 7:23 <b>fact</b> [10] - 21:1, 41:16, 44:5, 47:13, 48:9, 50:21, 50:23, 52:8, 68:9, 79:21 <b>factual</b> [7] - 28:12, 28:15, 28:21, 28:24, 29:13, 29:21, 30:7 <b>fair</b> [1] - 60:20 <b>fairly</b> [1] - 65:20 <b>fairness</b> [4] - 13:7,	<b>game</b> [1] - 13:6 <b>generator</b> [1] - 35:18 <b>Georgia</b> [1] - 2:20 <b>germane</b> [2] - 38:20, 54:4 <b>given</b> [6] - 30:24, 37:16, 68:9, 68:20,	<b>H</b>	<b>Hague</b> [4] - 66:1, 67:15, 67:18, 68:4 <b>half</b> [1] - 54:1 <b>hand</b> [5] - 10:4, 10:16, 77:2, 79:1, 80:17 <b>handed</b> [9] - 70:16, 71:5, 71:12, 77:3, 77:16, 78:11, 79:15, 79:16, 80:4 <b>handle</b> [1] - 24:1 <b>handled</b> [2] - 42:8, 59:8 <b>handles</b> [1] - 78:21 <b>handling</b> [1] - 10:7 <b>happy</b> [3] - 5:13, 68:21, 78:25 <b>hard</b> [1] - 15:15 <b>hate</b> [1] - 73:17 <b>Healthcare</b> [1] - 2:14 <b>hear</b> [11] - 5:17, 6:7, 10:20, 18:10, 43:16, 51:17, 53:3, 53:4, 53:17, 63:19, 65:11 <b>heard</b> [4] - 16:4, 45:25, 56:25, 60:20 <b>hearing</b> [9] - 29:10, 65:18, 65:21, 66:9, 67:3, 69:13, 70:6, 71:17, 78:20 <b>heat</b> [1] - 47:5 <b>HEINZ</b> [5] - 2:23, 9:11, 66:13, 67:23, 68:25 <b>Heinz</b> [6] - 9:9, 65:17, 66:11, 67:21, 68:23, 69:9 <b>Heinz's</b> [1] - 66:7 <b>held</b> [1] - 4:1 <b>help</b> [3] - 24:10, 70:3, 75:4 <b>helpful</b> [1] - 71:17 <b>herself</b> [1] - 18:22 <b>Hetero</b> [6] - 3:5, 5:10, 5:12, 5:16, 6:18 <b>hi</b> [1] - 66:13 <b>highly</b> [3] - 9:19, 50:4,

<p>73:4 <b>Highway</b> <sup>[1]</sup> - 2:6 <b>HILL</b> <sup>[1]</sup> - 3:2 <b>Hilton</b> <sup>[12]</sup> - 35:13, 40:10, 41:13, 47:14, 55:14, 61:14, 62:5, 64:4, 64:5, 64:23, 64:25, 65:5 <b>HILTON</b> <sup>[6]</sup> - 1:19, 40:10, 62:5, 64:3, 64:5, 65:6 <b>hinder</b> <sup>[1]</sup> - 41:4 <b>history</b> <sup>[1]</sup> - 44:3 <b>hold</b> <sup>[8]</sup> - 26:18, 40:4, 43:17, 63:18, 69:18, 78:6 <b>HONIK</b> <sup>[19]</sup> - 1:16, 1:16, 35:12, 35:21, 36:10, 36:12, 38:4, 39:7, 43:8, 43:12, 45:22, 45:24, 46:2, 52:6, 52:15, 53:1, 53:23, 56:21, 61:3 <b>Honik</b> <sup>[11]</sup> - 35:10, 37:25, 39:16, 45:14, 50:14, 50:23, 51:12, 51:17, 53:17, 55:22, 56:9 <b>Honik's</b> <sup>[3]</sup> - 56:16, 60:14, 63:21 <b>Honor</b> <sup>[122]</sup> - 5:10, 5:11, 5:12, 5:13, 5:14, 5:19, 5:24, 5:25, 6:4, 6:20, 7:10, 8:20, 9:22, 9:25, 10:4, 10:14, 10:24, 11:2, 12:21, 14:11, 14:13, 14:21, 15:8, 17:21, 18:11, 18:15, 18:17, 18:19, 19:7, 19:10, 19:11, 20:5, 20:8, 22:1, 23:9, 23:12, 25:22, 26:17, 26:23, 27:6, 27:10, 28:1, 29:16, 30:14, 30:15, 30:19, 32:8, 33:10, 33:13, 33:15, 34:25, 35:3, 35:12, 35:21, 36:1, 36:10, 37:10, 38:4, 38:24, 39:10, 39:15, 39:24, 40:7, 40:10, 41:13, 41:18, 42:16, 42:20, 43:5, 43:6, 45:21, 45:22, 45:23, 45:25, 46:2, 46:24, 50:9, 50:14, 51:8, 52:6, 52:15, 52:18, 53:2, 53:5, 54:11, 56:21, 56:23, 57:3, 60:9,</p>	<p>61:3, 61:16, 62:5, 62:8, 62:24, 64:3, 64:19, 64:21, 64:24, 65:2, 65:9, 65:14, 66:13, 66:14, 67:9, 67:23, 68:20, 68:25, 69:17, 71:15, 71:23, 72:9, 72:14, 74:4, 74:8, 75:16, 76:11, 79:2, 80:19, 81:5 <b>Honor's</b> <sup>[1]</sup> - 72:1 <b>Honorable</b> <sup>[2]</sup> - 3:9, 4:2 <b>HONORABLE</b> <sup>[1]</sup> - 1:10 <b>hoops</b> <sup>[1]</sup> - 18:5 <b>hope</b> <sup>[4]</sup> - 29:5, 32:9, 65:4, 69:24 <b>hopeful</b> <sup>[1]</sup> - 28:19 <b>hopefully</b> <sup>[1]</sup> - 20:3 <b>hoping</b> <sup>[5]</sup> - 29:10, 34:3, 34:6, 65:20, 73:25 <b>hosting</b> <sup>[1]</sup> - 11:4 <b>hour</b> <sup>[3]</sup> - 71:6, 71:10, 78:20 <b>hours</b> <sup>[12]</sup> - 15:23, 48:17, 64:9, 70:12, 70:22, 70:25, 71:2, 71:4 <b>Huahai</b> <sup>[1]</sup> - 2:14 <b>hung</b> <sup>[1]</sup> - 68:13</p>	<p>28:13, 29:12 <b>IN</b> <sup>[1]</sup> - 1:4 <b>Inc</b> <sup>[4]</sup> - 2:18, 2:21, 2:22, 2:25 <b>include</b> <sup>[1]</sup> - 18:3 <b>included</b> <sup>[1]</sup> - 58:15 <b>incorrectly</b> <sup>[1]</sup> - 53:4 <b>incur</b> <sup>[1]</sup> - 13:2 <b>incurring</b> <sup>[1]</sup> - 14:7 <b>independent</b> <sup>[1]</sup> - 31:17 <b>indicated</b> <sup>[4]</sup> - 53:7, 70:9, 77:14, 77:25 <b>indicates</b> <sup>[1]</sup> - 31:8 <b>indication</b> <sup>[1]</sup> - 8:5 <b>indulge</b> <sup>[2]</sup> - 28:4, 69:25 <b>indulgence</b> <sup>[1]</sup> - 47:19 <b>Industries</b> <sup>[1]</sup> - 2:21 <b>inequitable</b> <sup>[1]</sup> - 23:25 <b>information</b> <sup>[20]</sup> - 9:23, 10:18, 27:18, 28:12, 28:15, 28:22, 28:24, 29:13, 29:22, 31:25, 36:25, 37:15, 37:20, 37:23, 39:5, 40:22, 44:1, 57:16, 57:17 <b>infrastructure</b> <sup>[1]</sup> - 12:2 <b>Initial</b> <sup>[1]</sup> - 36:23 <b>initial</b> <sup>[1]</sup> - 43:24 <b>initiate</b> <sup>[2]</sup> - 55:17, 57:17 <b>inquire</b> <sup>[1]</sup> - 25:16 <b>insensitive</b> <sup>[2]</sup> - 48:8 <b>instance</b> <sup>[2]</sup> - 50:25, 53:15 <b>instances</b> <sup>[2]</sup> - 55:12, 77:15 <b>instead</b> <sup>[2]</sup> - 51:18, 58:8 <b>insubstantial</b> <sup>[1]</sup> - 63:12 <b>intact</b> <sup>[1]</sup> - 11:24 <b>intend</b> <sup>[1]</sup> - 72:10 <b>intended</b> <sup>[1]</sup> - 50:11 <b>intending</b> <sup>[1]</sup> - 6:10 <b>intent</b> <sup>[2]</sup> - 22:21, 71:16 <b>interested</b> <sup>[1]</sup> - 65:18 <b>interpretations</b> <sup>[1]</sup> - 67:13 <b>interpreter</b> <sup>[1]</sup> - 24:5 <b>interrupt</b> <sup>[8]</sup> - 8:22, 20:14, 32:21, 33:12, 33:13, 39:23, 44:18 <b>investment</b> <sup>[1]</sup> - 12:1 <b>invite</b> <sup>[1]</sup> - 38:5 <b>inviting</b> <sup>[1]</sup> - 72:15</p>	<p><b>involved</b> <sup>[2]</sup> - 16:17, 69:6 <b>Israel</b> <sup>[1]</sup> - 72:17 <b>issue</b> <sup>[85]</sup> - 4:15, 4:24, 6:6, 12:23, 13:25, 16:5, 17:20, 18:2, 18:15, 18:17, 20:6, 20:11, 21:23, 22:2, 22:3, 22:4, 22:5, 22:8, 23:1, 23:2, 23:5, 23:11, 23:12, 24:22, 25:2, 25:25, 26:14, 27:2, 27:3, 27:5, 27:6, 27:7, 27:12, 28:21, 40:13, 42:7, 43:14, 44:14, 47:2, 47:4, 47:16, 47:18, 47:20, 47:25, 48:3, 48:7, 51:1, 53:6, 57:10, 57:11, 57:12, 57:13, 58:12, 58:19, 58:24, 60:15, 60:17, 63:11, 63:25, 64:6, 64:12, 65:18, 65:19, 66:7, 66:18, 67:3, 67:14, 69:20, 69:23, 70:2, 70:19, 72:2, 72:7, 72:8, 76:7, 76:10, 76:24, 77:21, 79:5, 79:18, 79:19, 79:25 <b>issues</b> <sup>[21]</sup> - 4:6, 4:8, 4:14, 4:17, 4:18, 7:7, 10:12, 13:21, 24:12, 25:23, 26:7, 27:1, 30:21, 35:8, 45:18, 51:6, 53:7, 53:10, 63:24, 69:2, 70:6 <b>it'll</b> <sup>[1]</sup> - 20:11 <b>item</b> <sup>[1]</sup> - 26:6 <b>itself</b> <sup>[4]</sup> - 37:19, 38:25, 50:17, 68:3</p>	<p>14:15, 14:22, 16:3, 18:9, 18:16, 20:4, 20:14, 20:24, 21:23, 24:1, 24:11, 25:7, 25:14, 25:24, 26:2, 26:5, 26:20, 27:4, 27:25, 28:6, 29:15, 30:2, 30:5, 31:13, 32:13, 32:20, 33:5, 33:11, 33:24, 35:1, 35:10, 35:16, 35:24, 36:2, 36:7, 36:11, 36:16, 37:12, 37:21, 37:25, 38:22, 39:3, 39:16, 40:2, 40:6, 40:9, 41:12, 42:7, 42:18, 43:4, 43:17, 43:21, 44:18, 46:1, 50:10, 52:11, 52:24, 53:3, 53:13, 56:4, 56:24, 57:5, 57:9, 58:23, 60:13, 60:24, 61:18, 62:2, 62:23, 63:14, 64:4, 64:20, 65:10, 66:3, 67:8, 67:14, 67:20, 68:12, 68:23, 69:4, 69:14, 69:18, 70:1, 71:25, 73:8, 74:12, 75:14, 76:1, 78:6, 80:2, 80:20, 80:23, 80:25, 81:4 <b>Judge</b> <sup>[25]</sup> - 6:22, 13:8, 24:10, 31:16, 43:13, 44:7, 45:3, 47:1, 47:16, 48:15, 49:18, 50:24, 52:2, 53:24, 54:6, 55:2, 57:18, 67:23, 69:16, 69:25, 70:19, 70:20, 76:5, 77:22, 81:2 <b>judge</b> <sup>[8]</sup> - 5:7, 20:12, 22:6, 22:8, 23:11, 43:15, 55:21, 76:3 <b>judgment</b> <sup>[1]</sup> - 31:17 <b>Judicial</b> <sup>[1]</sup> - 3:9 <b>jump</b> <sup>[2]</sup> - 72:14, 78:25 <b>jumping</b> <sup>[1]</sup> - 67:2 <b>juncture</b> <sup>[1]</sup> - 20:8 <b>jurisdiction's</b> <sup>[1]</sup> - 31:23 <b>jury</b> <sup>[7]</sup> - 19:14, 19:24, 20:18, 21:18, 23:5, 23:10, 23:20 <b>jury's</b> <sup>[1]</sup> - 22:16 <b>justification</b> <sup>[2]</sup> - 49:13, 54:16</p>
<b>I</b>				
<p><b>idea</b> <sup>[2]</sup> - 54:7, 55:18 <b>identified</b> <sup>[3]</sup> - 4:9, 18:18, 55:9 <b>identify</b> <sup>[9]</sup> - 8:4, 10:22, 36:17, 40:25, 41:10, 48:9, 52:16, 52:19, 63:12 <b>identifying</b> <sup>[3]</sup> - 19:18, 40:22, 61:10 <b>image</b> <sup>[2]</sup> - 12:9, 12:16 <b>immediately</b> <sup>[1]</sup> - 54:22 <b>impact</b> <sup>[2]</sup> - 55:24, 64:24 <b>impacts</b> <sup>[1]</sup> - 65:19 <b>impair</b> <sup>[1]</sup> - 41:4 <b>imperfect</b> <sup>[1]</sup> - 50:4 <b>implemented</b> <sup>[1]</sup> - 9:24 <b>important</b> <sup>[4]</sup> - 20:11, 20:21, 25:8, 70:20 <b>impose</b> <sup>[5]</sup> - 48:18, 49:20, 50:6, 74:1, 80:14 <b>impossible</b> <sup>[1]</sup> - 10:10 <b>impressions</b> <sup>[2]</sup> -</p>				
<b>J</b>				
<p><b>January</b> <sup>[1]</sup> - 29:3 <b>JERSEY</b> <sup>[1]</sup> - 1:1 <b>Jersey</b> <sup>[3]</sup> - 1:8, 1:14, 3:4 <b>Jessica</b> <sup>[1]</sup> - 9:9 <b>JESSICA</b> <sup>[2]</sup> - 2:12, 2:23 <b>John</b> <sup>[3]</sup> - 40:7, 62:24, 79:3 <b>JOHN</b> <sup>[1]</sup> - 2:8 <b>JUDGE</b> <sup>[114]</sup> - 4:3, 5:9, 5:15, 5:22, 6:1, 6:9, 6:18, 6:23, 7:9, 7:25, 8:21, 9:8, 9:12, 9:21, 10:3, 10:20, 10:25, 12:8, 12:20, 13:22,</p>				

<b>K</b>	71:4 <b>leave</b> <sup>[1]</sup> - 29:13 <b>left</b> <sup>[1]</sup> - 58:9 <b>legally</b> <sup>[1]</sup> - 19:8 <b>lengthy</b> <sup>[1]</sup> - 66:3 <b>less</b> <sup>[3]</sup> - 8:15, 17:10, 75:4 <b>letter</b> <sup>[14]</sup> - 4:23, 7:2, 7:3, 10:21, 45:14, 46:5, 46:25, 48:6, 48:11, 53:24, 66:6, 66:7, 69:2, 78:16 <b>letters</b> <sup>[1]</sup> - 65:16 <b>letting</b> <sup>[1]</sup> - 32:6 <b>level</b> <sup>[2]</sup> - 15:21, 74:7 <b>LIABILITY</b> <sup>[1]</sup> - 1:4 <b>liaison</b> <sup>[1]</sup> - 78:17	<b>look</b> <sup>[16]</sup> - 8:17, 11:19, 17:11, 36:20, 45:7, 47:25, 48:10, 51:7, 51:15, 56:14, 59:22, 59:23, 60:4, 69:12, 73:3 <b>looked</b> <sup>[7]</sup> - 32:23, 41:14, 42:19, 54:6, 59:7, 59:8, 63:7 <b>looking</b> <sup>[20]</sup> - 6:12, 14:13, 15:4, 21:2, 34:4, 37:11, 37:19, 39:1, 40:3, 40:19, 45:4, 53:10, 59:2, 61:5, 61:23, 64:17, 66:1, 73:12, 73:15, 73:16 <b>looks</b> <sup>[4]</sup> - 14:12, 37:13, 39:18, 59:4 <b>Loretta</b> <sup>[1]</sup> - 3:9 <b>loud</b> <sup>[2]</sup> - 59:11, 60:3 <b>Louisiana</b> <sup>[1]</sup> - 1:20 <b>love</b> <sup>[1]</sup> - 33:5 <b>lower</b> <sup>[1]</sup> - 12:25 <b>Ltd</b> <sup>[2]</sup> - 2:14, 2:21 <b>luxury</b> <sup>[1]</sup> - 50:2	<b>Market</b> <sup>[1]</sup> - 1:17 <b>Marlene</b> <sup>[1]</sup> - 65:14 <b>MARLENE</b> <sup>[1]</sup> - 2:2 <b>MASTER</b> <sup>[1]</sup> - 1:10 <b>Master</b> <sup>[4]</sup> - 4:2, 4:5, 54:11, 54:21 <b>matter</b> <sup>[13]</sup> - 4:9, 6:19, 16:15, 32:6, 37:2, 44:11, 56:19, 58:9, 59:5, 59:7, 62:14, 64:9, 81:10 <b>matters</b> <sup>[3]</sup> - 6:12, 32:4, 61:13 <b>MAZIE</b> <sup>[1]</sup> - 1:13 <b>MDL2875</b> <sup>[1]</sup> - 36:20 <b>mean</b> <sup>[10]</sup> - 23:1, 26:13, 33:11, 38:24, 51:19, 52:7, 65:1, 68:5, 76:9, 77:9 <b>meaningful</b> <sup>[1]</sup> - 33:17 <b>means</b> <sup>[1]</sup> - 33:25 <b>mechanical</b> <sup>[1]</sup> - 1:24 <b>mechanism</b> <sup>[3]</sup> - 52:6, 52:10, 52:11 <b>meet</b> <sup>[12]</sup> - 27:15, 27:16, 27:17, 27:20, 28:3, 32:17, 47:18, 49:13, 50:4, 52:5, 58:4, 59:14 <b>meet-and-confer</b> <sup>[1]</sup> - 52:5 <b>mention</b> <sup>[2]</sup> - 58:6, 62:7 <b>mentioned</b> <sup>[2]</sup> - 4:5, 58:5 <b>Meridan</b> <sup>[1]</sup> - 63:25 <b>met</b> <sup>[1]</sup> - 33:1 <b>midpoint</b> <sup>[1]</sup> - 29:11 <b>might</b> <sup>[2]</sup> - 10:16, 70:3 <b>million</b> <sup>[1]</sup> - 44:12 <b>millions</b> <sup>[2]</sup> - 44:12, 44:13 <b>mimics</b> <sup>[1]</sup> - 14:5 <b>minimum</b> <sup>[1]</sup> - 70:23 <b>Minneapolis</b> <sup>[1]</sup> - 2:3 <b>Minnesota</b> <sup>[1]</sup> - 2:3 <b>minute</b> <sup>[4]</sup> - 12:15, 74:16, 74:17, 74:19 <b>minutes</b> <sup>[9]</sup> - 69:25, 73:12, 73:14, 73:24, 74:22, 75:11, 79:12, 79:23 <b>misstate</b> <sup>[1]</sup> - 51:4 <b>misunderstanding</b> <sup>[1]</sup> - 78:22 <b>Mitchell</b> <sup>[1]</sup> - 1:7 <b>modification</b> <sup>[1]</sup> - 68:3 <b>modify</b> <sup>[1]</sup> - 67:22 <b>moment</b> <sup>[3]</sup> - 47:4, 76:18, 77:7	<b>Monday</b> <sup>[6]</sup> - 56:16, 61:1, 61:15, 62:3, 75:1, 76:15 <b>money</b> <sup>[1]</sup> - 51:7 <b>monograph</b> <sup>[3]</sup> - 72:25, 73:22, 73:23 <b>month</b> <sup>[1]</sup> - 66:1 <b>months</b> <sup>[2]</sup> - 44:8, 45:20 <b>morning</b> <sup>[3]</sup> - 11:1, 40:17, 73:6 <b>MORRIS</b> <sup>[1]</sup> - 2:11 <b>most</b> <sup>[5]</sup> - 11:9, 12:11, 12:18, 31:11, 52:20 <b>motion</b> <sup>[13]</sup> - 6:14, 15:8, 27:8, 27:9, 29:25, 30:5, 30:10, 33:9, 33:21, 42:8, 66:23, 67:2, 68:10 <b>move</b> <sup>[6]</sup> - 27:24, 45:19, 53:10, 56:8, 59:17, 60:22 <b>moving</b> <sup>[3]</sup> - 65:23, 70:3, 77:9 <b>MR</b> <sup>[148]</sup> - 5:7, 5:10, 5:24, 5:25, 6:2, 6:17, 6:20, 7:2, 7:10, 8:20, 8:22, 9:6, 9:13, 9:22, 10:4, 10:24, 11:1, 12:11, 12:21, 13:24, 14:21, 14:23, 17:21, 18:11, 18:17, 20:5, 20:13, 20:20, 21:6, 22:1, 22:10, 22:23, 22:24, 23:1, 23:9, 23:10, 23:12, 24:9, 25:6, 25:8, 25:22, 26:3, 26:4, 26:13, 26:23, 27:6, 28:1, 28:7, 29:16, 30:4, 30:13, 30:14, 32:8, 32:15, 32:25, 33:10, 33:13, 34:25, 35:2, 35:12, 35:21, 36:1, 36:3, 36:10, 36:12, 37:10, 37:13, 37:22, 38:4, 38:24, 39:4, 39:7, 39:15, 39:24, 39:25, 40:4, 40:7, 41:13, 42:16, 42:17, 42:19, 43:5, 43:6, 43:8, 43:10, 43:12, 43:13, 43:19, 43:23, 44:17, 44:20, 45:22, 45:23, 45:24, 46:2, 50:14, 52:6, 52:15, 53:1, 53:2, 53:4, 53:14, 53:23, 55:21, 56:21, 56:23, 57:3, 57:6, 57:10, 60:9,
<b>L</b>	<b>Labs</b> <sup>[3]</sup> - 3:5, 5:10, 5:12 <b>laid</b> <sup>[3]</sup> - 6:4, 14:24, 44:12 <b>language</b> <sup>[23]</sup> - 12:13, 13:3, 15:12, 15:23, 16:16, 19:7, 19:17, 20:17, 21:4, 21:7, 21:15, 22:11, 23:19, 24:3, 24:8, 24:18, 24:21, 25:1, 25:15, 25:21, 64:7, 68:1, 76:14 <b>languages</b> <sup>[2]</sup> - 8:6, 8:13 <b>large</b> <sup>[1]</sup> - 10:1 <b>largely</b> <sup>[1]</sup> - 30:6 <b>larger</b> <sup>[3]</sup> - 36:13, 40:13, 52:17 <b>largest</b> <sup>[1]</sup> - 40:13 <b>larry</b> <sup>[1]</sup> - 3:10 <b>Lasalle</b> <sup>[1]</sup> - 2:3 <b>last</b> <sup>[7]</sup> - 20:5, 28:8, 48:6, 50:1, 50:19, 54:7, 79:6 <b>Law</b> <sup>[1]</sup> - 3:9 <b>law</b> <sup>[13]</sup> - 27:5, 30:11, 30:12, 30:18, 30:22, 31:1, 31:2, 31:17, 31:18, 31:20, 31:21, 31:23, 32:2 <b>LAW</b> <sup>[1]</sup> - 2:2 <b>lawsuits</b> <sup>[1]</sup> - 57:17 <b>lawyer</b> <sup>[1]</sup> - 30:20 <b>lawyers</b> <sup>[6]</sup> - 30:24, 30:25, 51:7, 51:14, 72:6, 75:1 <b>Layne</b> <sup>[4]</sup> - 40:10, 48:17, 62:5, 64:5 <b>LAYNE</b> <sup>[1]</sup> - 1:19 <b>learned</b> <sup>[1]</sup> - 79:24 <b>least</b> <sup>[6]</sup> - 5:1, 5:3, 17:5, 17:16, 63:6,	<b>lieu</b> <sup>[1]</sup> - 7:15 <b>light</b> <sup>[1]</sup> - 70:2 <b>lighten</b> <sup>[1]</sup> - 43:11 <b>likely</b> <sup>[1]</sup> - 20:8 <b>limit</b> <sup>[2]</sup> - 48:14, 50:7 <b>limitations</b> <sup>[1]</sup> - 60:10 <b>limited</b> <sup>[2]</sup> - 48:14, 49:7 <b>limiting</b> <sup>[2]</sup> - 49:8, 49:22 <b>Line</b> <sup>[3]</sup> - 28:13, 28:25, 32:11 <b>line</b> <sup>[6]</sup> - 20:11, 35:5, 74:19, 76:24, 77:9, 79:16 <b>lion's</b> <sup>[1]</sup> - 15:12 <b>list</b> <sup>[9]</sup> - 16:23, 16:24, 26:7, 26:14, 26:22, 49:11, 51:14, 51:22, 53:18 <b>listen</b> <sup>[3]</sup> - 21:18, 43:21, 78:13 <b>literally</b> <sup>[2]</sup> - 46:17, 47:7 <b>LITIGATION</b> <sup>[1]</sup> - 1:4 <b>litigation</b> <sup>[1]</sup> - 44:23 <b>litigations</b> <sup>[1]</sup> - 42:25 <b>live</b> <sup>[3]</sup> - 23:14, 47:12, 49:25 <b>LLC</b> <sup>[6]</sup> - 1:13, 1:19, 2:2, 2:14, 2:21, 2:25 <b>LLP</b> <sup>[6]</sup> - 2:5, 2:8, 2:11, 2:15, 2:19, 3:2 <b>local</b> <sup>[1]</sup> - 28:16 <b>located</b> <sup>[1]</sup> - 64:10 <b>LOCKARD</b> <sup>[4]</sup> - 2:19, 69:17, 69:19, 72:14 <b>Lockard</b> <sup>[3]</sup> - 69:17, 69:19, 75:15 <b>log</b> <sup>[1]</sup> - 27:10 <b>logs</b> <sup>[1]</sup> - 27:13 <b>longwinded</b> <sup>[1]</sup> - 55:16	<b>M</b> <b>machine</b> <sup>[18]</sup> - 5:3, 6:25, 7:11, 8:16, 8:25, 9:17, 9:23, 10:2, 11:6, 13:9, 14:3, 14:8, 14:14, 16:10, 16:11, 17:2, 21:9, 21:11 <b>MacStravic</b> <sup>[1]</sup> - 3:10 <b>majority</b> <sup>[2]</sup> - 51:13, 55:13 <b>manageable</b> <sup>[2]</sup> - 55:19, 60:19 <b>management</b> <sup>[1]</sup> - 37:6 <b>Mandarin</b> <sup>[18]</sup> - 4:16, 4:20, 5:2, 5:4, 8:3, 8:7, 8:8, 8:9, 10:15, 11:12, 19:21, 20:17, 21:11, 22:11, 22:18, 23:8, 64:7, 64:16 <b>Mandarin-speaking</b> <sup>[1]</sup> - 8:7 <b>manner</b> <sup>[6]</sup> - 17:1, 34:20, 35:11, 38:6, 56:8, 62:21 <b>manpower</b> <sup>[1]</sup> - 15:20 <b>manual</b> <sup>[1]</sup> - 14:9 <b>manually</b> <sup>[1]</sup> - 14:6 <b>manufacturing</b> <sup>[3]</sup> - 37:4, 38:7, 39:22 <b>marginal</b> <sup>[1]</sup> - 33:20 <b>marginally</b> <sup>[1]</sup> - 58:20	<b>Monday</b> <sup>[6]</sup> - 56:16, 61:1, 61:15, 62:3, 75:1, 76:15 <b>money</b> <sup>[1]</sup> - 51:7 <b>monograph</b> <sup>[3]</sup> - 72:25, 73:22, 73:23 <b>month</b> <sup>[1]</sup> - 66:1 <b>months</b> <sup>[2]</sup> - 44:8, 45:20 <b>morning</b> <sup>[3]</sup> - 11:1, 40:17, 73:6 <b>MORRIS</b> <sup>[1]</sup> - 2:11 <b>most</b> <sup>[5]</sup> - 11:9, 12:11, 12:18, 31:11, 52:20 <b>motion</b> <sup>[13]</sup> - 6:14, 15:8, 27:8, 27:9, 29:25, 30:5, 30:10, 33:9, 33:21, 42:8, 66:23, 67:2, 68:10 <b>move</b> <sup>[6]</sup> - 27:24, 45:19, 53:10, 56:8, 59:17, 60:22 <b>moving</b> <sup>[3]</sup> - 65:23, 70:3, 77:9 <b>MR</b> <sup>[148]</sup> - 5:7, 5:10, 5:24, 5:25, 6:2, 6:17, 6:20, 7:2, 7:10, 8:20, 8:22, 9:6, 9:13, 9:22, 10:4, 10:24, 11:1, 12:11, 12:21, 13:24, 14:21, 14:23, 17:21, 18:11, 18:17, 20:5, 20:13, 20:20, 21:6, 22:1, 22:10, 22:23, 22:24, 23:1, 23:9, 23:10, 23:12, 24:9, 25:6, 25:8, 25:22, 26:3, 26:4, 26:13, 26:23, 27:6, 28:1, 28:7, 29:16, 30:4, 30:13, 30:14, 32:8, 32:15, 32:25, 33:10, 33:13, 34:25, 35:2, 35:12, 35:21, 36:1, 36:3, 36:10, 36:12, 37:10, 37:13, 37:22, 38:4, 38:24, 39:4, 39:7, 39:15, 39:24, 39:25, 40:4, 40:7, 41:13, 42:16, 42:17, 42:19, 43:5, 43:6, 43:8, 43:10, 43:12, 43:13, 43:19, 43:23, 44:17, 44:20, 45:22, 45:23, 45:24, 46:2, 50:14, 52:6, 52:15, 53:1, 53:2, 53:4, 53:14, 53:23, 55:21, 56:21, 56:23, 57:3, 57:6, 57:10, 60:9,



<p>60:14, 60:25, 61:3, 62:1, 62:24, 64:19, 64:21, 69:16, 69:23, 70:2, 71:23, 72:1, 74:4, 74:13, 75:16, 75:18, 76:2, 76:3, 76:4, 76:5, 76:6, 76:11, 77:13, 77:18, 77:20, 78:2, 78:3, 78:5, 78:9, 78:13, 78:15, 78:16, 79:2, 80:19, 80:22, 80:24, 81:2, 81:5</p> <p><b>MS</b> [19] - 5:19, 9:11, 40:10, 62:5, 64:3, 64:5, 65:6, 65:14, 66:8, 66:13, 67:9, 67:16, 67:23, 68:19, 68:25, 69:8, 69:17, 69:19, 72:14</p> <p><b>multiple</b> [1] - 11:3</p> <p><b>musings</b> [1] - 60:3</p> <p><b>must</b> [1] - 68:10</p> <p><b>mute</b> [2] - 9:6, 9:9</p> <p><b>Mylan</b> [23] - 2:18, 34:1, 35:14, 36:14, 36:23, 38:6, 39:6, 39:13, 40:14, 42:22, 47:14, 47:24, 48:4, 48:25, 49:11, 50:18, 51:14, 51:20, 51:21, 53:6, 53:15, 56:25, 61:8</p>	<p>77:7</p> <p><b>needed</b> [3] - 18:24, 19:1, 46:16</p> <p><b>needles</b> [1] - 35:21</p> <p><b>needs</b> [3] - 45:10, 64:1, 76:24</p> <p><b>negotiated</b> [2] - 56:19, 57:6</p> <p><b>negotiating</b> [2] - 50:20, 57:19</p> <p><b>neutral</b> [1] - 31:22</p> <p><b>never</b> [7] - 9:17, 15:13, 19:1, 58:12, 72:23, 73:4, 74:20</p> <p><b>NEW</b> [1] - 1:1</p> <p><b>New</b> [4] - 1:8, 1:14, 1:20, 3:4</p> <p><b>next</b> [4] - 26:6, 56:15, 62:18, 78:13</p> <p><b>nice</b> [1] - 81:2</p> <p><b>night</b> [2] - 75:1, 76:15</p> <p><b>nine</b> [1] - 78:20</p> <p><b>nine-hour</b> [1] - 78:20</p> <p><b>nobody</b> [2] - 33:25, 78:21</p> <p><b>nobody's</b> [1] - 32:5</p> <p><b>nonresponsive</b> [10] - 4:10, 34:2, 34:12, 42:13, 44:9, 45:1, 57:1, 57:10, 59:4, 59:16</p> <p><b>note</b> [2] - 67:9, 69:8</p> <p><b>noted</b> [1] - 47:14</p> <p><b>nothing</b> [7] - 17:15, 26:4, 30:9, 32:19, 46:11, 46:18, 59:9</p> <p><b>notice</b> [2] - 69:6, 72:6</p> <p><b>November</b> [3] - 47:9, 47:12, 50:19</p> <p><b>NUMBER</b> [1] - 1:3</p> <p><b>number</b> [18] - 35:18, 36:15, 36:18, 40:8, 41:17, 42:20, 48:14, 48:21, 49:6, 49:7, 50:21, 50:23, 51:4, 52:17, 54:14, 63:7, 73:14, 73:21</p> <p><b>Number</b> [2] - 36:20, 54:17</p> <p><b>numbers</b> [2] - 61:18, 61:19</p>	<p><b>obligation</b> [1] - 18:20</p> <p><b>observations</b> [1] - 35:9</p> <p><b>observed</b> [1] - 40:17</p> <p><b>obvious</b> [1] - 38:6</p> <p><b>obviously</b> [4] - 7:6, 20:20, 36:13, 50:16</p> <p><b>occur</b> [1] - 38:10</p> <p><b>occurring</b> [1] - 79:20</p> <p><b>occurs</b> [1] - 49:15</p> <p><b>OCR</b> [1] - 12:17</p> <p><b>October</b> [1] - 66:20</p> <p><b>OF</b> [1] - 1:1</p> <p><b>offered</b> [1] - 63:17</p> <p><b>office</b> [1] - 65:25</p> <p><b>Official</b> [1] - 1:22</p> <p><b>official</b> [1] - 19:5</p> <p><b>often</b> [3] - 19:18, 21:13, 41:25</p> <p><b>oftentimes</b> [1] - 41:20</p> <p><b>on-the-record</b> [1] - 27:15</p> <p><b>One</b> [2] - 2:17, 47:22</p> <p><b>one</b> [40] - 4:5, 6:2, 11:25, 12:22, 15:8, 17:23, 18:21, 19:9, 20:5, 22:16, 25:6, 28:4, 28:17, 31:19, 32:15, 33:14, 33:19, 37:3, 38:13, 41:15, 41:18, 41:19, 50:22, 54:6, 54:25, 58:1, 60:16, 62:7, 62:25, 63:22, 64:7, 66:10, 69:19, 69:24, 71:10, 71:19, 75:2, 75:18, 77:1, 79:15</p> <p><b>one's</b> [1] - 31:13</p> <p><b>one-day</b> [1] - 71:19</p> <p><b>ones</b> [3] - 30:25, 58:21, 58:22</p> <p><b>open</b> [2] - 9:7, 60:14</p> <p><b>operating</b> [13] - 37:14, 38:9, 38:18, 38:25, 39:11, 40:14, 40:16, 40:18, 40:21, 41:1, 41:7, 41:9, 41:10</p> <p><b>operative</b> [3] - 18:23, 19:14, 25:12</p> <p><b>opine</b> [1] - 31:1</p> <p><b>opinion</b> [4] - 31:14, 31:19, 31:22, 43:1</p> <p><b>opinions</b> [2] - 29:13, 32:3</p> <p><b>opportunity</b> [4] - 8:17, 56:4, 61:7, 64:13</p> <p><b>opposed</b> [3] - 20:18, 56:20, 78:19</p> <p><b>opposing</b> [1] - 49:11</p> <p><b>optional</b> [1] - 67:25</p>	<p><b>order</b> [17] - 8:1, 14:9, 36:3, 36:5, 36:19, 40:25, 45:6, 45:12, 45:16, 50:18, 50:19, 55:10, 56:9, 56:13, 65:8, 68:14, 69:4</p> <p><b>Order</b> [1] - 4:5</p> <p><b>ordered</b> [2] - 32:5, 56:18</p> <p><b>orders</b> [1] - 45:19</p> <p><b>ordinary</b> [2] - 18:24, 25:10</p> <p><b>original</b> [3] - 13:4, 14:5, 57:6</p> <p><b>Orleans</b> [1] - 1:20</p> <p><b>otherwise</b> [6] - 58:6, 58:13, 58:14, 69:11, 77:8, 80:16</p> <p><b>ought</b> [3] - 44:6, 45:4, 45:18</p> <p><b>outlined</b> [1] - 55:23</p> <p><b>outset</b> [1] - 48:7</p> <p><b>outstanding</b> [1] - 26:7</p> <p><b>over-designated</b> [1] - 15:9</p> <p><b>overarching</b> [1] - 35:8</p> <p><b>overriding</b> [1] - 14:16</p> <p><b>own</b> [3] - 11:8, 21:14, 76:14</p> <p><b>Oxford</b> [1] - 2:17</p>	<p><b>part</b> [9] - 12:19, 14:24, 21:9, 41:25, 43:13, 43:14, 62:15, 64:16, 77:23</p> <p><b>participate</b> [2] - 5:12, 76:12</p> <p><b>particular</b> [13] - 10:22, 16:5, 26:25, 31:23, 33:1, 35:6, 35:7, 36:19, 37:1, 58:16, 59:5, 66:7, 71:9</p> <p><b>particularly</b> [3] - 11:3, 12:12, 61:8</p> <p><b>parties</b> [5] - 44:10, 66:18, 68:2, 70:3, 70:10</p> <p><b>parties'</b> [1] - 26:24</p> <p><b>parts</b> [2] - 35:2, 80:15</p> <p><b>party</b> [1] - 72:21</p> <p><b>past</b> [1] - 53:10</p> <p><b>path</b> [2] - 63:17, 63:18</p> <p><b>pathway</b> [1] - 72:10</p> <p><b>pay</b> [1] - 13:10</p> <p><b>pdf</b> [3] - 12:12, 12:13</p> <p><b>Pedano</b> [2] - 1:22, 81:12</p> <p><b>pejoratively</b> [1] - 23:14</p> <p><b>pencils</b> [1] - 48:16</p> <p><b>pending</b> [1] - 15:9</p> <p><b>Peng</b> [1] - 74:24</p> <p><b>pennies</b> [1] - 9:25</p> <p><b>Pennsylvania</b> [4] - 1:17, 2:13, 2:17, 2:24</p> <p><b>people</b> [1] - 38:16</p> <p><b>per</b> [3] - 50:8, 51:2, 51:19</p> <p><b>percent</b> [3] - 34:15, 51:9, 51:11</p> <p><b>perfect</b> [3] - 6:17, 49:25, 50:3</p> <p><b>perfectly</b> [2] - 12:5, 17:3</p> <p><b>performed</b> [1] - 38:7</p> <p><b>perhaps</b> [4] - 16:22, 29:7, 63:21, 65:22</p> <p><b>period</b> [1] - 51:23</p> <p><b>personal</b> [1] - 56:3</p> <p><b>personally</b> [2] - 5:16, 63:7</p> <p><b>perspective</b> [6] - 19:6, 20:25, 34:10, 34:11, 35:20, 55:22</p> <p><b>perspectives</b> [1] - 26:11</p> <p><b>pertaining</b> [1] - 20:7</p> <p><b>PFC</b> [1] - 70:7</p> <p><b>Pharma</b> [3] - 2:22, 2:25, 2:25</p>
<p><b>N</b></p> <p><b>NAKUL</b> [1] - 3:3</p> <p><b>name</b> [2] - 40:19, 40:22</p> <p><b>narrow</b> [6] - 15:17, 27:13, 31:11, 33:4, 43:15, 46:14</p> <p><b>narrowed</b> [2] - 27:7, 27:14</p> <p><b>native</b> [4] - 24:21, 25:1, 25:15, 25:21</p> <p><b>nature</b> [5] - 7:6, 9:20, 11:7, 30:7, 37:17</p> <p><b>NE</b> [1] - 2:20</p> <p><b>necessarily</b> [1] - 31:20</p> <p><b>necessary</b> [5] - 5:16, 8:1, 36:18, 60:2, 69:3</p> <p><b>need</b> [24] - 7:19, 8:11, 15:16, 15:25, 16:23, 19:2, 23:7, 27:24, 34:16, 47:18, 50:11, 57:2, 63:20, 69:5, 69:9, 69:11, 70:8, 73:1, 73:9, 73:17, 75:12, 76:17, 77:4,</p>	<p><b>O</b></p> <p><b>oath</b> [1] - 54:9</p> <p><b>object</b> [3] - 7:13, 7:19, 11:22</p> <p><b>objection</b> [6] - 7:21, 7:22, 11:21, 16:7, 16:9, 16:17</p> <p><b>objections</b> [1] - 17:5</p>			

<b>Pharmaceutical</b> <sup>[1]</sup> - 2:21 <b>Pharmaceuticals</b> <sup>[4]</sup> - 2:13, 2:14, 2:18, 2:21 <b>pharmacovigilance</b> <sup>[1]</sup> - 37:5 <b>Philadelphia</b> <sup>[2]</sup> - 1:17, 2:13 <b>phone</b> <sup>[3]</sup> - 9:6, 9:7, 78:25 <b>Piedmont</b> <sup>[1]</sup> - 2:20 <b>PIETRAGALLO</b> <sup>[1]</sup> - 2:15 <b>pin</b> <sup>[1]</sup> - 35:22 <b>Pittsburgh</b> <sup>[1]</sup> - 2:17 <b>place</b> <sup>[4]</sup> - 46:19, 54:3, 70:18, 79:6 <b>placing</b> <sup>[1]</sup> - 22:17 <b>plaintiff</b> <sup>[8]</sup> - 8:8, 8:24, 47:23, 50:21, 50:25, 59:12, 59:17, 77:2 <b>plaintiffs</b> <sup>[43]</sup> - 5:15, 5:18, 7:15, 13:1, 13:5, 13:11, 14:18, 27:1, 27:9, 27:18, 27:20, 27:23, 29:24, 33:21, 36:7, 39:5, 40:11, 40:23, 41:8, 44:2, 49:23, 51:4, 51:18, 51:21, 53:7, 54:14, 57:15, 61:1, 62:6, 62:10, 62:24, 64:5, 65:15, 66:21, 66:25, 68:10, 70:12, 70:14, 70:17, 70:22, 77:1, 77:15, 78:17 <b>Plaintiffs</b> <sup>[6]</sup> - 1:15, 1:18, 1:21, 2:4, 2:7, 2:10 <b>plaintiffs'</b> <sup>[6]</sup> - 34:10, 35:19, 52:16, 67:24, 78:23, 80:17 <b>planning</b> <sup>[1]</sup> - 69:20 <b>play</b> <sup>[1]</sup> - 23:16 <b>plenty</b> <sup>[1]</sup> - 31:20 <b>point</b> <sup>[16]</sup> - 4:7, 6:5, 12:22, 21:15, 27:3, 27:7, 27:23, 29:6, 29:14, 29:24, 29:25, 39:10, 42:15, 62:10, 72:13, 75:8 <b>pointed</b> <sup>[2]</sup> - 35:16, 55:4 <b>pool</b> <sup>[1]</sup> - 52:17 <b>populated</b> <sup>[3]</sup> - 37:15, 39:4, 39:11 <b>portions</b> <sup>[1]</sup> - 23:16 <b>position</b> <sup>[7]</sup> - 6:4, 37:22, 66:17, 66:25, 67:22, 67:24, 80:9 <b>possible</b> <sup>[1]</sup> - 11:25 <b>possibly</b> <sup>[1]</sup> - 19:10 <b>potential</b> <sup>[1]</sup> - 48:18 <b>potentially</b> <sup>[4]</sup> - 23:23, 34:5, 57:16, 62:20 <b>practical</b> <sup>[2]</sup> - 46:23, 52:22 <b>practice</b> <sup>[2]</sup> - 42:25, 79:15 <b>precedent</b> <sup>[1]</sup> - 31:7 <b>precisely</b> <sup>[2]</sup> - 49:18, 50:24 <b>preclude</b> <sup>[1]</sup> - 33:25 <b>prejudice</b> <sup>[3]</sup> - 21:4, 23:23, 49:23 <b>prejudiced</b> <sup>[4]</sup> - 20:16, 20:23, 20:25, 22:8 <b>prejudicing</b> <sup>[1]</sup> - 68:23 <b>premature</b> <sup>[2]</sup> - 20:7, 47:17 <b>prep</b> <sup>[1]</sup> - 15:24 <b>preparation</b> <sup>[1]</sup> - 49:23 <b>prepared</b> <sup>[2]</sup> - 36:12, 54:2 <b>PRESENT</b> <sup>[1]</sup> - 3:8 <b>present</b> <sup>[2]</sup> - 5:2, 43:15 <b>presented</b> <sup>[4]</sup> - 4:24, 6:13, 49:17, 60:17 <b>presenting</b> <sup>[1]</sup> - 5:4 <b>presently</b> <sup>[1]</sup> - 48:25 <b>preserve</b> <sup>[1]</sup> - 17:4 <b>preserved</b> <sup>[2]</sup> - 16:7, 16:17 <b>presiding</b> <sup>[1]</sup> - 20:9 <b>pressant</b> <sup>[1]</sup> - 47:3 <b>pressing</b> <sup>[1]</sup> - 26:15 <b>presumably</b> <sup>[2]</sup> - 23:6, 24:24 <b>prevent</b> <sup>[1]</sup> - 54:8 <b>preview</b> <sup>[1]</sup> - 63:11 <b>primarily</b> <sup>[1]</sup> - 58:5 <b>Princeton</b> <sup>[1]</sup> - 3:4 <b>Prinston</b> <sup>[1]</sup> - 2:13 <b>prioritization</b> <sup>[3]</sup> - 4:8, 6:12, 52:21 <b>prioritizing</b> <sup>[1]</sup> - 48:22 <b>priority</b> <sup>[5]</sup> - 16:23, 16:24, 26:7, 26:22, 26:25 <b>PRISELAC</b> <sup>[1]</sup> - 2:12 <b>privileged</b> <sup>[1]</sup> - 34:20 <b>problem</b> <sup>[17]</sup> - 11:13, 14:18, 15:10, 34:22, 35:19, 44:20, 45:3, 49:15, 54:1, 66:16, 74:9, 76:22, 76:23, 76:25, 77:13, 77:19, 78:17 <b>procedural</b> <sup>[1]</sup> - 5:7 <b>procedure</b> <sup>[7]</sup> - 37:14, 38:9, 38:18, 38:25, 39:11, 41:9, 49:9 <b>procedures</b> <sup>[8]</sup> - 40:14, 40:16, 40:18, 40:21, 41:1, 41:8, 41:11, 67:15 <b>proceed</b> <sup>[2]</sup> - 34:20, 45:19 <b>proceeded</b> <sup>[1]</sup> - 62:15 <b>proceeding</b> <sup>[2]</sup> - 35:11, 71:12 <b>proceedings</b> <sup>[2]</sup> - 81:6, 81:10 <b>PROCEEDINGS</b> <sup>[1]</sup> - 4:1 <b>Proceedings</b> <sup>[1]</sup> - 1:24 <b>process</b> <sup>[14]</sup> - 29:17, 40:23, 42:3, 52:5, 54:12, 55:2, 55:17, 62:11, 62:13, 62:22, 63:20, 65:24, 66:4, 68:13 <b>processes</b> <sup>[1]</sup> - 37:18 <b>produce</b> <sup>[6]</sup> - 10:16, 11:11, 42:3, 45:1, 49:14, 53:21 <b>produced</b> <sup>[25]</sup> - 1:25, 8:6, 11:8, 13:19, 16:14, 18:4, 18:12, 18:13, 29:9, 29:22, 30:7, 41:15, 41:16, 42:2, 42:22, 44:6, 44:7, 44:10, 51:11, 54:9, 55:15, 57:2, 58:14, 59:2, 59:16 <b>product</b> <sup>[3]</sup> - 37:16, 38:14, 58:18 <b>production</b> <sup>[7]</sup> - 18:1, 30:6, 42:9, 49:15, 50:19, 53:10, 54:19 <b>PRODUCTS</b> <sup>[1]</sup> - 1:4 <b>products</b> <sup>[8]</sup> - 37:18, 57:13, 57:16, 57:21, 57:22, 58:5, 58:22 <b>professional</b> <sup>[1]</sup> - 79:9 <b>programs</b> <sup>[1]</sup> - 59:9 <b>project</b> <sup>[1]</sup> - 16:1 <b>prolong</b> <sup>[3]</sup> - 60:11, 71:18, 78:11 <b>prolongs</b> <sup>[1]</sup> - 72:22 <b>proper</b> <sup>[4]</sup> - 66:22, 67:1, 67:6, 68:8 <b>properly</b> <sup>[1]</sup> - 37:24 <b>proportionality</b> <sup>[2]</sup> - 44:11, 60:16 <b>proportionate</b> <sup>[1]</sup> - 51:16 <b>proposal</b> <sup>[7]</sup> - 53:21, 53:23, 55:24, 56:2, 56:16, 60:20, 61:16 <b>propose</b> <sup>[2]</sup> - 48:5, 49:21 <b>proposed</b> <sup>[4]</sup> - 9:1, 48:14, 50:5, 54:12 <b>proposing</b> <sup>[5]</sup> - 48:11, 48:20, 48:25, 52:12, 52:21 <b>proprietary</b> <sup>[4]</sup> - 9:16, 9:24, 10:13, 11:9 <b>protection</b> <sup>[1]</sup> - 21:19 <b>protocol</b> <sup>[21]</sup> - 38:17, 45:6, 51:2, 51:24, 57:1, 57:6, 57:19, 66:18, 66:22, 66:23, 66:24, 67:1, 67:10, 67:12, 67:21, 67:22, 67:25, 68:3, 68:9, 68:10, 71:8 <b>protocols</b> <sup>[5]</sup> - 42:24, 44:3, 45:12, 45:13, 45:14 <b>provide</b> <sup>[9]</sup> - 10:17, 12:9, 43:3, 49:10, 49:13, 53:20, 54:16, 61:8, 71:15 <b>provided</b> <sup>[12]</sup> - 9:22, 25:9, 25:14, 27:11, 27:17, 28:4, 28:15, 33:15, 38:2, 51:12, 56:5 <b>pulled</b> <sup>[2]</sup> - 35:17, 37:10 <b>pulling</b> <sup>[1]</sup> - 15:23 <b>purpose</b> <sup>[1]</sup> - 5:4 <b>purposes</b> <sup>[6]</sup> - 4:4, 13:20, 31:17, 34:4, 34:14, 39:19 <b>pursuant</b> <sup>[1]</sup> - 31:7 <b>push</b> <sup>[1]</sup> - 56:14 <b>put</b> <sup>[12]</sup> - 16:24, 22:22, 29:14, 38:15, 39:12, 65:7, 68:7, 68:8, 69:10, 71:21, 75:10, 77:6 <b>puts</b> <sup>[1]</sup> - 52:19 <b>putting</b> <sup>[2]</sup> - 15:25, 18:4	<b>quick</b> <sup>[1]</sup> - 66:13 <b>quickly</b> <sup>[1]</sup> - 50:15 <b>quite</b> <sup>[2]</sup> - 21:13, 41:19 <b>quote</b> <sup>[1]</sup> - 47:21 <b>quoted</b> <sup>[1]</sup> - 47:1  <b>R</b> <b>raise</b> <sup>[6]</sup> - 13:17, 18:2, 21:20, 64:8, 69:23, 72:7 <b>raised</b> <sup>[13]</sup> - 10:13, 14:19, 17:23, 21:23, 22:2, 24:11, 24:22, 25:2, 27:1, 50:25, 72:12, 77:21, 79:19 <b>raising</b> <sup>[3]</sup> - 22:8, 45:18, 51:5 <b>RANDOLPH</b> <sup>[1]</sup> - 2:8 <b>random</b> <sup>[6]</sup> - 4:11, 34:8, 35:4, 35:17, 36:8, 52:14 <b>RASPANTI</b> <sup>[1]</sup> - 2:15 <b>rather</b> <sup>[4]</sup> - 56:19, 61:22, 67:2, 68:7 <b>RE</b> <sup>[1]</sup> - 1:4 <b>re</b> <sup>[4]</sup> - 44:14, 51:3, 54:9, 60:18 <b>re-call</b> <sup>[1]</sup> - 54:9 <b>re-review</b> <sup>[2]</sup> - 51:3, 60:18 <b>re-reviewed</b> <sup>[1]</sup> - 44:14 <b>reach</b> <sup>[1]</sup> - 46:18 <b>reached</b> <sup>[2]</sup> - 46:13, 57:20 <b>read</b> <sup>[15]</sup> - 21:18, 23:4, 23:7, 32:10, 46:18, 47:19, 65:3, 71:13, 72:3, 72:4, 72:18, 76:18, 76:19, 77:7, 79:15 <b>reader</b> <sup>[1]</sup> - 64:11 <b>reading</b> <sup>[2]</sup> - 32:11, 76:14 <b>reads</b> <sup>[1]</sup> - 65:1 <b>ready</b> <sup>[4]</sup> - 27:8, 72:5, 74:14, 76:20 <b>real</b> <sup>[3]</sup> - 6:5, 66:13, 74:18 <b>reality</b> <sup>[2]</sup> - 71:7, 71:9 <b>realize</b> <sup>[2]</sup> - 43:20, 60:1 <b>realized</b> <sup>[2]</sup> - 8:23, 57:25 <b>really</b> <sup>[11]</sup> - 12:23,
	<b>Q</b> <b>QA</b> <sup>[1]</sup> - 38:16 <b>qualified</b> <sup>[1]</sup> - 68:1 <b>qualify</b> <sup>[1]</sup> - 67:17 <b>questioned</b> <sup>[1]</sup> - 21:17 <b>questioning</b> <sup>[3]</sup> - 19:25, 21:8, 22:12 <b>questions</b> <sup>[11]</sup> - 4:24,

<p>15:16, 18:20, 28:22, 39:16, 41:2, 47:3, 47:10, 57:11, 65:2</p> <p><b>reason</b> [6] - 38:19, 49:3, 72:15, 73:9, 73:18, 77:22</p> <p><b>reasonable</b> [13] - 10:11, 15:14, 18:8, 18:9, 22:22, 29:11, 52:1, 53:9, 55:23, 56:11, 73:19, 73:20, 78:22</p> <p><b>reasons</b> [1] - 33:15</p> <p><b>receive</b> [2] - 62:14, 62:21</p> <p><b>received</b> [2] - 4:23, 59:12</p> <p><b>recently</b> [1] - 59:8</p> <p><b>recognized</b> [1] - 31:21</p> <p><b>recollection</b> [1] - 75:19</p> <p><b>recommendation</b> [1] - 31:15</p> <p><b>reconstitute</b> [1] - 15:21</p> <p><b>record</b> [35] - 17:22, 19:11, 21:20, 21:24, 22:13, 22:17, 22:20, 22:24, 27:15, 29:17, 32:10, 36:4, 50:16, 65:7, 68:8, 69:10, 70:10, 70:17, 70:18, 71:3, 71:12, 72:18, 72:24, 74:11, 75:20, 75:21, 75:25, 76:4, 77:17, 78:10, 79:4, 79:13, 79:17, 79:22, 81:10</p> <p><b>recorded</b> [1] - 1:24</p> <p><b>records</b> [1] - 37:6</p> <p><b>red</b> [1] - 6:5</p> <p><b>redact</b> [2] - 29:11, 31:4</p> <p><b>redacted</b> [9] - 28:16, 29:9, 31:4, 31:6, 46:17, 46:19, 46:20, 57:24, 58:8</p> <p><b>redacting</b> [1] - 57:25</p> <p><b>redaction</b> [2] - 46:16</p> <p><b>redactions</b> [2] - 30:8, 33:8</p> <p><b>Redondo</b> [1] - 2:6</p> <p><b>reduce</b> [3] - 8:1, 53:25, 60:19</p> <p><b>reducing</b> [1] - 51:25</p> <p><b>referred</b> [2] - 50:23, 79:3</p> <p><b>referring</b> [2] - 41:17, 46:11</p> <p><b>refers</b> [1] - 29:21</p>	<p><b>reflects</b> [1] - 29:17</p> <p><b>reframe</b> [1] - 36:13</p> <p><b>regarded</b> [1] - 42:13</p> <p><b>regarding</b> [2] - 30:16, 57:8</p> <p><b>regulation</b> [2] - 19:6, 24:15</p> <p><b>regulatory</b> [1] - 15:13</p> <p><b>relate</b> [2] - 40:18, 49:2</p> <p><b>related</b> [9] - 19:5, 37:6, 37:14, 57:13, 57:21, 58:5, 58:18, 58:22, 61:11</p> <p><b>relegated</b> [1] - 49:1</p> <p><b>relevance</b> [2] - 43:25, 59:24</p> <p><b>relevant</b> [14] - 34:22, 38:14, 38:20, 41:16, 42:1, 42:5, 42:9, 51:23, 55:9, 58:13, 58:20, 58:21, 59:19</p> <p><b>relying</b> [1] - 32:1</p> <p><b>remaining</b> [1] - 54:19</p> <p><b>remains</b> [1] - 47:13</p> <p><b>remember</b> [3] - 49:3, 51:3, 79:8</p> <p><b>REMOTE</b> [1] - 1:6</p> <p><b>remote</b> [1] - 4:1</p> <p><b>repeat</b> [1] - 42:21</p> <p><b>reply</b> [1] - 56:15</p> <p><b>report</b> [3] - 56:5, 61:1</p> <p><b>Reporter</b> [1] - 1:22</p> <p><b>Reporter/Transcriber</b> [1] - 81:12</p> <p><b>represent</b> [1] - 5:10</p> <p><b>representative</b> [1] - 48:2</p> <p><b>representatives</b> [2] - 70:15, 70:24</p> <p><b>represented</b> [2] - 18:13, 30:19</p> <p><b>representing</b> [1] - 18:14</p> <p><b>request</b> [5] - 42:8, 42:13, 57:23, 58:7, 58:17</p> <p><b>requests</b> [1] - 62:9</p> <p><b>require</b> [3] - 22:11, 47:23, 47:24</p> <p><b>required</b> [3] - 24:17, 44:25, 72:17</p> <p><b>requirement</b> [1] - 74:2</p> <p><b>requires</b> [1] - 30:22</p> <p><b>research</b> [2] - 7:4, 11:25</p> <p><b>reserve</b> [2] - 7:19, 69:10</p> <p><b>reserved</b> [1] - 16:9</p> <p><b>reserving</b> [1] - 7:12</p>	<p><b>resolve</b> [1] - 63:25</p> <p><b>resolved</b> [6] - 6:10, 6:14, 20:12, 22:3, 65:23, 68:16</p> <p><b>respect</b> [20] - 16:8, 16:18, 17:9, 17:18, 24:14, 24:22, 27:3, 27:5, 31:18, 34:4, 35:8, 37:18, 39:6, 47:14, 51:6, 63:24, 70:20, 74:5, 75:19, 77:13</p> <p><b>respond</b> [2] - 45:23, 69:9</p> <p><b>response</b> [3] - 10:18, 26:1, 29:3</p> <p><b>responses</b> [1] - 35:15</p> <p><b>responsive</b> [26] - 34:5, 34:6, 34:11, 34:13, 34:14, 34:16, 37:24, 38:3, 38:15, 41:16, 42:6, 42:22, 43:1, 43:2, 44:9, 45:2, 45:16, 54:17, 54:22, 55:10, 57:23, 58:7, 58:17, 59:25, 60:5</p> <p><b>responsiveness</b> [4] - 45:8, 49:10, 53:19, 54:21</p> <p><b>rest</b> [1] - 68:19</p> <p><b>restricted</b> [1] - 13:18</p> <p><b>result</b> [1] - 8:11</p> <p><b>resuming</b> [1] - 53:16</p> <p><b>resumé</b> [1] - 64:17</p> <p><b>retained</b> [1] - 30:20</p> <p><b>retrospectively</b> [1] - 74:21</p> <p><b>review</b> [29] - 4:11, 11:4, 15:24, 24:6, 33:16, 34:16, 34:18, 44:15, 45:17, 50:3, 50:6, 51:3, 53:19, 54:21, 60:18, 62:9, 62:17, 63:18, 70:17, 71:5, 71:13, 73:25, 74:10, 75:4, 77:4, 80:5, 80:12, 80:15</p> <p><b>reviewed</b> [4] - 31:5, 44:14, 51:14</p> <p><b>reviewers</b> [1] - 51:10</p> <p><b>reviewing</b> [5] - 15:24, 30:17, 79:13, 79:23</p> <p><b>revise</b> [1] - 66:23</p> <p><b>revisit</b> [2] - 54:5, 76:23</p> <p><b>rewrite</b> [2] - 44:3</p> <p><b>ripe</b> [6] - 4:6, 6:12, 6:13, 26:8, 27:2, 47:17</p> <p><b>Risk</b> [1] - 36:23</p>	<p><b>risk</b> [8] - 37:7, 38:7, 38:11, 38:13, 38:17, 39:8, 39:12, 39:19</p> <p><b>risks</b> [1] - 38:18</p> <p><b>RMR</b> [1] - 81:12</p> <p><b>road</b> [1] - 7:21</p> <p><b>Road</b> [3] - 2:9, 2:20, 3:4</p> <p><b>Robert</b> [1] - 3:9</p> <p><b>roll</b> [1] - 20:22</p> <p><b>Roseland</b> [1] - 1:14</p> <p><b>Roszel</b> [1] - 3:4</p> <p><b>route</b> [2] - 5:5, 7:23</p> <p><b>RPR</b> [1] - 81:12</p> <p><b>Ruben</b> [3] - 43:11, 53:5, 53:22</p> <p><b>RUBEN</b> [1] - 1:16</p> <p><b>Rule</b> [4] - 67:17, 67:24, 68:1</p> <p><b>rule</b> [8] - 7:20, 68:4, 73:9, 73:18, 74:19, 77:22, 80:11, 80:13</p> <p><b>ruled</b> [5] - 72:2, 72:9, 72:11, 74:4, 77:10</p> <p><b>rules</b> [1] - 80:8</p> <p><b>ruling</b> [10] - 16:23, 20:7, 20:9, 65:2, 75:7, 75:12, 75:19, 75:20, 75:23, 78:1</p> <p><b>ruling's</b> [1] - 75:8</p> <p><b>rulings</b> [1] - 22:15</p> <p><b>run</b> [1] - 11:9</p> <p><b>running</b> [3] - 73:25, 80:4, 80:16</p>	<p>50:24, 57:18, 70:20</p> <p><b>Schneider's</b> [1] - 54:6</p> <p><b>scope</b> [3] - 7:7, 30:10, 51:25</p> <p><b>screen</b> [5] - 14:12, 19:12, 19:16, 21:17, 22:17</p> <p><b>search</b> [3] - 40:24, 40:25, 50:21</p> <p><b>searchable</b> [2] - 12:12, 12:13</p> <p><b>searching</b> [1] - 41:10</p> <p><b>seasoned</b> [1] - 79:9</p> <p><b>second</b> [5] - 18:2, 18:17, 18:22, 28:4, 51:8</p> <p><b>seconds</b> [4] - 73:16, 74:16, 74:17, 74:19</p> <p><b>secret</b> [5] - 27:10, 27:12, 28:10, 30:11, 31:18</p> <p><b>secrets</b> [1] - 27:5</p> <p><b>security</b> [7] - 13:17, 13:21, 13:23, 13:24, 14:16, 14:19, 15:7</p> <p><b>see</b> [34] - 4:7, 8:1, 9:25, 14:15, 17:7, 17:12, 19:15, 20:9, 20:24, 21:14, 22:16, 24:20, 27:11, 28:21, 29:14, 33:3, 33:5, 33:16, 39:1, 43:8, 46:5, 55:12, 56:1, 56:19, 59:24, 59:25, 60:21, 61:23, 62:9, 62:18, 63:10, 63:17, 78:9, 80:13</p> <p><b>seeing</b> [2] - 21:4, 40:3</p> <p><b>seek</b> [1] - 77:21</p> <p><b>seem</b> [1] - 18:7</p> <p><b>selecting</b> [1] - 49:6</p> <p><b>selective</b> [1] - 42:3</p> <p><b>selectively</b> [1] - 47:1</p> <p><b>send</b> [5] - 26:18, 66:10, 68:14, 69:4, 78:16</p> <p><b>sends</b> [2] - 12:14, 45:14</p> <p><b>sense</b> [13] - 23:21, 46:22, 50:5, 56:2, 56:3, 58:3, 59:22, 60:6, 60:10, 61:4, 61:9, 76:6, 76:7</p> <p><b>sensitized</b> [1] - 59:7</p> <p><b>sent</b> [5] - 18:21, 34:8, 51:21, 54:20, 55:14</p> <p><b>sentences</b> [1] - 47:19</p> <p><b>Sentry</b> [1] - 2:24</p> <p><b>separate</b> [2] - 21:12, 26:18</p>
<b>S</b>				
<p><b>sample</b> [9] - 4:11, 4:13, 34:8, 35:18, 36:4, 48:19, 52:14, 52:19, 61:17</p> <p><b>sampled</b> [1] - 36:15</p> <p><b>sampling</b> [3] - 35:4, 36:9</p> <p><b>sanctions</b> [4] - 30:9, 30:16, 31:9, 32:5</p> <p><b>satisfied</b> [2] - 4:12, 54:18</p> <p><b>save</b> [1] - 60:23</p> <p><b>saw</b> [3] - 65:16, 66:6, 66:7</p> <p><b>scanned</b> [2] - 12:9, 12:16</p> <p><b>schedule</b> [2] - 67:4, 70:21</p> <p><b>scheduled</b> [3] - 4:4, 7:18, 65:20</p> <p><b>schedules</b> [1] - 69:5</p> <p><b>scheduling</b> [1] - 69:13</p> <p><b>Schneider</b> [7] - 47:2, 47:16, 48:15, 49:19,</p>				

<p><b>September</b><sup>[3]</sup> - 44:8, 44:25, 46:6</p> <p><b>series</b><sup>[1]</sup> - 11:14</p> <p><b>serious</b><sup>[3]</sup> - 32:6, 47:18, 56:12</p> <p><b>served</b><sup>[1]</sup> - 75:4</p> <p><b>server's</b><sup>[1]</sup> - 65:24</p> <p><b>service</b><sup>[2]</sup> - 67:14, 67:17</p> <p><b>session</b><sup>[1]</sup> - 68:14</p> <p><b>set</b><sup>[5]</sup> - 31:7, 31:11, 51:12, 51:15, 53:23</p> <p><b>SETH</b><sup>[1]</sup> - 2:11</p> <p><b>Seth</b><sup>[3]</sup> - 64:21, 64:22, 75:16</p> <p><b>seven</b><sup>[7]</sup> - 44:8, 64:18, 70:11, 70:22, 70:25, 71:2, 71:10</p> <p><b>seven-hour</b><sup>[1]</sup> - 71:10</p> <p><b>several</b><sup>[3]</sup> - 70:24, 80:6, 80:7</p> <p><b>shadows</b><sup>[1]</sup> - 43:9</p> <p><b>SHAH</b><sup>[1]</sup> - 3:3</p> <p><b>share</b><sup>[1]</sup> - 15:12</p> <p><b>sharing</b><sup>[1]</sup> - 14:13</p> <p><b>sharpen</b><sup>[1]</sup> - 48:16</p> <p><b>sheet</b><sup>[1]</sup> - 46:19</p> <p><b>sheeted</b><sup>[1]</sup> - 58:8</p> <p><b>short</b><sup>[8]</sup> - 30:24, 31:13, 31:19, 35:18, 35:25, 36:6, 51:23, 79:10</p> <p><b>shorten</b><sup>[1]</sup> - 54:24</p> <p><b>shortly</b><sup>[1]</sup> - 66:8</p> <p><b>show</b><sup>[6]</sup> - 14:11, 14:17, 19:24, 21:10, 21:16, 23:5</p> <p><b>shown</b><sup>[4]</sup> - 23:7, 70:15, 72:25, 73:11</p> <p><b>shriff</b><sup>[3]</sup> - 30:24, 31:13, 31:19</p> <p><b>side</b><sup>[7]</sup> - 16:1, 17:5, 49:11, 52:16, 60:16, 64:2, 74:6</p> <p><b>sides</b><sup>[2]</sup> - 63:22, 80:10</p> <p><b>significant</b><sup>[4]</sup> - 12:1, 23:23, 64:14, 73:1</p> <p><b>similar</b><sup>[2]</sup> - 11:11, 14:2</p> <p><b>simple</b><sup>[1]</sup> - 9:14</p> <p><b>simply</b><sup>[10]</sup> - 9:4, 9:18, 14:6, 31:4, 46:19, 48:9, 54:20, 58:12, 58:15, 78:9</p> <p><b>single</b><sup>[4]</sup> - 22:15, 44:6, 79:16, 79:18</p> <p><b>singular</b><sup>[1]</sup> - 46:14</p> <p><b>sit</b><sup>[1]</sup> - 50:2</p> <p><b>site</b><sup>[1]</sup> - 75:24</p>	<p><b>sitting</b><sup>[3]</sup> - 18:5, 19:14, 80:9</p> <p><b>situation</b><sup>[1]</sup> - 78:9</p> <p><b>six</b><sup>[5]</sup> - 36:23, 45:20, 51:9, 51:11, 66:1</p> <p><b>size</b><sup>[2]</sup> - 4:12, 35:18</p> <p><b>skin</b><sup>[1]</sup> - 13:6</p> <p><b>SLACK</b><sup>[1]</sup> - 2:8</p> <p><b>SLATER</b><sup>[49]</sup> - 1:13, 1:13, 5:24, 6:2, 6:17, 7:2, 9:6, 10:4, 14:21, 14:23, 17:21, 18:17, 20:13, 20:20, 21:6, 22:10, 22:24, 23:9, 23:12, 24:9, 25:6, 25:8, 25:22, 26:3, 26:13, 28:1, 28:7, 30:4, 30:13, 32:8, 32:15, 32:25, 33:10, 71:23, 72:1, 74:4, 74:13, 76:3, 76:5, 76:11, 77:18, 78:2, 78:5, 78:13, 78:16, 80:19, 80:22, 80:24, 81:2</p> <p><b>Slater</b><sup>[27]</sup> - 5:6, 5:24, 6:24, 9:21, 10:3, 14:22, 17:21, 20:15, 20:19, 22:2, 22:4, 22:7, 26:7, 27:18, 27:25, 29:21, 30:3, 30:19, 31:3, 32:8, 71:23, 71:25, 74:3, 76:11, 77:14, 78:6, 80:11</p> <p><b>slip</b><sup>[2]</sup> - 46:19, 58:8</p> <p><b>slow</b><sup>[1]</sup> - 71:12</p> <p><b>small</b><sup>[2]</sup> - 22:10, 70:19</p> <p><b>Smith</b><sup>[1]</sup> - 3:9</p> <p><b>Snider</b><sup>[6]</sup> - 79:6, 79:7, 79:10, 79:11, 79:12, 79:22</p> <p><b>so-called</b><sup>[1]</sup> - 46:10</p> <p><b>software</b><sup>[3]</sup> - 9:16, 9:24, 10:13</p> <p><b>solace</b><sup>[1]</sup> - 22:10</p> <p><b>Solco</b><sup>[1]</sup> - 2:14</p> <p><b>solely</b><sup>[2]</sup> - 57:21, 57:22</p> <p><b>solution</b><sup>[5]</sup> - 24:9, 61:8, 62:16, 63:21, 63:22</p> <p><b>solve</b><sup>[1]</sup> - 26:16</p> <p><b>solved</b><sup>[2]</sup> - 74:9, 77:19</p> <p><b>someone</b><sup>[3]</sup> - 65:24, 75:7, 78:25</p> <p><b>sometime</b><sup>[1]</sup> - 53:17</p> <p><b>sometimes</b><sup>[2]</sup> - 11:15</p>	<p><b>somewhat</b><sup>[1]</sup> - 41:2</p> <p><b>somewhere</b><sup>[1]</sup> - 20:10</p> <p><b>soon</b><sup>[2]</sup> - 65:20, 70:16</p> <p><b>sorry</b><sup>[14]</sup> - 5:25, 6:9, 8:22, 19:23, 20:1, 20:14, 33:14, 40:2, 43:6, 43:10, 44:17, 76:2</p> <p><b>sort</b><sup>[5]</sup> - 40:21, 41:22, 59:20, 59:21, 64:12</p> <p><b>sound</b><sup>[1]</sup> - 70:19</p> <p><b>sounded</b><sup>[1]</sup> - 52:24</p> <p><b>sounds</b><sup>[7]</sup> - 15:1, 18:9, 52:1, 52:3, 52:4, 65:17</p> <p><b>South</b><sup>[2]</sup> - 2:6, 2:12</p> <p><b>SPEAKER</b><sup>[1]</sup> - 9:9</p> <p><b>speaking</b><sup>[6]</sup> - 8:7, 51:21, 69:12, 70:15, 70:16, 76:8</p> <p><b>SPECIAL</b><sup>[1]</sup> - 1:10</p> <p><b>Special</b><sup>[4]</sup> - 4:2, 4:5, 54:11, 54:20</p> <p><b>specific</b><sup>[6]</sup> - 12:4, 16:9, 35:3, 37:18, 45:5, 49:7</p> <p><b>specifically</b><sup>[3]</sup> - 10:18, 46:7, 58:18</p> <p><b>spend</b><sup>[2]</sup> - 48:17, 73:16</p> <p><b>spent</b><sup>[3]</sup> - 44:12, 51:7, 79:22</p> <p><b>spoken</b><sup>[2]</sup> - 23:20, 65:24</p> <p><b>spreadsheet</b><sup>[2]</sup> - 58:1, 58:2</p> <p><b>stab</b><sup>[1]</sup> - 38:4</p> <p><b>stand</b><sup>[1]</sup> - 23:6</p> <p><b>standard</b><sup>[14]</sup> - 7:1, 37:14, 38:9, 38:17, 38:25, 40:14, 40:16, 40:17, 40:21, 41:1, 41:7, 41:9, 41:10, 41:25</p> <p><b>standpoint</b><sup>[1]</sup> - 26:24</p> <p><b>stands</b><sup>[2]</sup> - 36:25, 65:1</p> <p><b>start</b><sup>[7]</sup> - 4:19, 4:25, 5:8, 10:4, 43:14, 71:8, 79:10</p> <p><b>started</b><sup>[8]</sup> - 4:3, 27:12, 53:6, 58:25, 66:9, 79:11, 79:13, 79:14</p> <p><b>starting</b><sup>[1]</sup> - 17:9</p> <p><b>starts</b><sup>[1]</sup> - 72:17</p> <p><b>state</b><sup>[9]</sup> - 12:7, 17:3, 27:4, 27:10, 27:12,</p>	<p>28:10, 30:11, 31:18, 38:6</p> <p><b>statement</b><sup>[1]</sup> - 30:15</p> <p><b>statements</b><sup>[1]</sup> - 29:13</p> <p><b>States</b><sup>[1]</sup> - 76:16</p> <p><b>STATES</b><sup>[1]</sup> - 1:1</p> <p><b>stateside</b><sup>[1]</sup> - 71:9</p> <p><b>stating</b><sup>[1]</sup> - 46:20</p> <p><b>STATUS</b><sup>[1]</sup> - 1:5</p> <p><b>statute</b><sup>[1]</sup> - 19:6</p> <p><b>stay</b><sup>[2]</sup> - 5:13, 76:4</p> <p><b>stayed</b><sup>[1]</sup> - 75:21</p> <p><b>stenographer</b><sup>[1]</sup> - 74:13</p> <p><b>stenography</b><sup>[1]</sup> - 1:24</p> <p><b>step</b><sup>[1]</sup> - 54:1</p> <p><b>steps</b><sup>[1]</sup> - 8:11</p> <p><b>stick</b><sup>[1]</sup> - 45:18</p> <p><b>still</b><sup>[4]</sup> - 24:18, 49:15, 63:5, 79:22</p> <p><b>stop</b><sup>[13]</sup> - 48:5, 73:4, 73:10, 73:15, 73:17, 73:23, 74:10, 76:2, 79:1, 80:12, 80:16, 80:18, 80:24</p> <p><b>stoppages</b><sup>[1]</sup> - 71:4</p> <p><b>stopped</b><sup>[2]</sup> - 75:21, 80:7</p> <p><b>stopping</b><sup>[2]</sup> - 75:23, 79:14</p> <p><b>stops</b><sup>[3]</sup> - 72:3, 73:3, 73:11</p> <p><b>STOY</b><sup>[11]</sup> - 2:16, 36:1, 36:3, 37:10, 37:13, 37:22, 38:24, 39:4, 39:24, 42:16, 43:5</p> <p><b>Stoy</b><sup>[9]</sup> - 35:5, 35:8, 35:16, 35:24, 37:8, 38:23, 39:23, 40:15, 43:4</p> <p><b>Street</b><sup>[3]</sup> - 1:17, 1:20, 2:12</p> <p><b>Streets</b><sup>[1]</sup> - 1:8</p> <p><b>strikes</b><sup>[1]</sup> - 38:19</p> <p><b>structure</b><sup>[1]</sup> - 50:5</p> <p><b>stuff</b><sup>[2]</sup> - 52:23, 78:21</p> <p><b>subject</b><sup>[3]</sup> - 7:12, 30:6, 46:11</p> <p><b>submission</b><sup>[1]</sup> - 9:25</p> <p><b>submissions</b><sup>[1]</sup> - 68:19</p> <p><b>submit</b><sup>[4]</sup> - 26:17, 61:15, 68:17</p> <p><b>submitted</b><sup>[1]</sup> - 24:15</p> <p><b>subpoenas</b><sup>[1]</sup> - 66:1</p> <p><b>subset</b><sup>[1]</sup> - 15:17</p> <p><b>substantial</b><sup>[1]</sup> - 63:3</p> <p><b>substantive</b><sup>[1]</sup> - 23:16</p>	<p><b>sufficiently</b><sup>[2]</sup> - 4:21, 69:2</p> <p><b>suggest</b><sup>[3]</sup> - 49:18, 50:1, 80:3</p> <p><b>suggested</b><sup>[3]</sup> - 7:5, 7:10, 9:18</p> <p><b>suggesting</b><sup>[3]</sup> - 8:24, 13:1, 32:5</p> <p><b>suggestion</b><sup>[2]</sup> - 10:2, 31:9</p> <p><b>suggestions</b><sup>[1]</sup> - 45:9</p> <p><b>Suite</b><sup>[4]</sup> - 1:17, 2:3, 2:9, 2:20</p> <p><b>Sunday</b><sup>[2]</sup> - 74:25, 76:15</p> <p><b>supplement</b><sup>[2]</sup> - 38:5, 47:11</p> <p><b>supplemental</b><sup>[2]</sup> - 69:1, 69:3</p> <p><b>suppliers</b><sup>[1]</sup> - 40:19</p> <p><b>supply</b><sup>[1]</sup> - 47:11</p> <p><b>support</b><sup>[1]</sup> - 37:4</p> <p><b>suppose</b><sup>[2]</sup> - 15:19, 69:8</p> <p><b>supposed</b><sup>[1]</sup> - 78:23</p> <p><b>Supreme</b><sup>[1]</sup> - 31:8</p> <p><b>surprise</b><sup>[2]</sup> - 29:5, 63:8</p> <p><b>surprisingly</b><sup>[1]</sup> - 47:1</p> <p><b>suspect</b><sup>[1]</sup> - 52:17</p> <p><b>system</b><sup>[13]</sup> - 9:2, 10:8, 11:9, 11:10, 37:4, 37:7, 37:16, 39:20, 39:21, 42:20, 48:13, 49:19, 50:8</p> <p><b>System</b><sup>[1]</sup> - 36:24</p> <p><b>systematically</b><sup>[1]</sup> - 49:20</p> <p><b>systems</b><sup>[5]</sup> - 11:23, 11:25, 12:2, 12:6, 39:19</p>
<b>T</b>				
<p><b>tabbed</b><sup>[1]</sup> - 75:6</p> <p><b>table</b><sup>[1]</sup> - 74:6</p> <p><b>talks</b><sup>[3]</sup> - 14:7, 14:14, 44:5</p> <p><b>target</b><sup>[1]</sup> - 77:10</p> <p><b>tasked</b><sup>[1]</sup> - 52:16</p> <p><b>team</b><sup>[7]</sup> - 15:24, 35:14, 51:10, 61:8, 63:1, 72:6, 78:18</p> <p><b>technical</b><sup>[2]</sup> - 9:20, 10:17</p> <p><b>teed</b><sup>[2]</sup> - 26:7, 48:1</p> <p><b>Tel</b><sup>[1]</sup> - 73:7</p> <p><b>template</b><sup>[1]</sup> - 37:15</p> <p><b>ten</b><sup>[6]</sup> - 17:14, 71:4, 71:6, 79:22, 80:7</p> <p><b>ten-hour</b><sup>[1]</sup> - 71:6</p>				



<p><b>tens</b> [3] - 47:11, 63:5, 63:9</p> <p><b>terms</b> [10] - 4:10, 7:7, 10:6, 12:7, 12:9, 13:15, 20:21, 40:25, 63:19</p> <p><b>test</b> [1] - 52:14</p> <p><b>testified</b> [1] - 79:7</p> <p><b>testimony</b> [3] - 21:19, 23:16, 71:2</p> <p><b>Teva</b> [4] - 2:21, 2:21, 54:25, 55:3</p> <p><b>Texas</b> [1] - 2:9</p> <p><b>text</b> [8] - 11:7, 11:11, 11:14, 11:16, 12:24, 14:4, 14:6, 15:22</p> <p><b>textual</b> [1] - 11:7</p> <p><b>THE</b> [4] - 1:1, 1:10, 66:11, 75:17</p> <p><b>theory</b> [1] - 52:1</p> <p><b>therefore</b> [1] - 52:9</p> <p><b>they've</b> [7] - 10:15, 14:25, 15:2, 32:23, 47:10, 59:12</p> <p><b>thinking</b> [2] - 9:11, 69:24</p> <p><b>third</b> [4] - 19:4, 25:2, 44:15, 51:15</p> <p><b>Thomas</b> [1] - 4:2</p> <p><b>THOMAS</b> [1] - 1:11</p> <p><b>thorough</b> [1] - 35:14</p> <p><b>thousands</b> [5] - 40:16, 47:11, 48:18, 63:5, 63:9</p> <p><b>three</b> [10] - 18:20, 20:2, 24:12, 29:8, 42:3, 44:12, 45:17, 53:20, 71:1, 75:11</p> <p><b>threshold</b> [1] - 67:19</p> <p><b>threw</b> [1] - 20:1</p> <p><b>throw</b> [1] - 45:11</p> <p><b>time-consuming</b> [1] - 62:13</p> <p><b>timely</b> [2] - 17:1, 62:13</p> <p><b>timer</b> [5] - 74:17, 76:19, 76:20, 77:3, 77:8</p> <p><b>tip</b> [1] - 35:22</p> <p><b>TISCHLER</b> [1] - 69:16</p> <p><b>Tischler</b> [1] - 69:20</p> <p><b>title</b> [2] - 36:22, 36:23</p> <p><b>today</b> [27] - 4:18, 6:8, 6:10, 6:15, 6:19, 20:10, 22:3, 22:4, 23:4, 26:9, 45:13, 46:3, 46:4, 47:3, 50:11, 56:9, 56:13, 63:23, 64:1, 64:24, 65:17, 65:18, 66:5, 68:6, 69:2, 69:7,</p>	<p>77:21</p> <p><b>together</b> [2] - 16:21, 50:1</p> <p><b>tomorrow</b> [1] - 72:16</p> <p><b>tongue</b> [1] - 43:7</p> <p><b>took</b> [6] - 43:20, 55:1, 55:6, 74:25, 79:6, 79:12</p> <p><b>top</b> [5] - 16:24, 26:14, 26:15, 26:21, 47:2</p> <p><b>topic</b> [1] - 25:11</p> <p><b>tops</b> [1] - 48:22</p> <p><b>totality</b> [1] - 63:8</p> <p><b>toto</b> [1] - 8:15</p> <p><b>toward</b> [1] - 70:11</p> <p><b>ToxRox</b> [1] - 63:25</p> <p><b>tracks</b> [1] - 48:13</p> <p><b>train</b> [1] - 37:6</p> <p><b>transcript</b> [9] - 1:24, 28:5, 29:8, 32:11, 33:15, 46:25, 47:22, 81:9</p> <p><b>transcription</b> [1] - 1:25</p> <p><b>Translate</b> [13] - 7:5, 12:1, 12:5, 12:9, 12:14, 13:15, 13:20, 14:2, 14:12, 14:19, 16:13, 16:14, 17:4</p> <p><b>translate</b> [10] - 7:8, 7:16, 9:3, 9:4, 9:19, 11:8, 13:13, 16:6, 64:16, 70:8</p> <p><b>translated</b> [16] - 8:16, 11:11, 12:14, 12:24, 13:3, 13:8, 14:25, 15:17, 17:11, 18:13, 18:25, 24:14, 25:1, 70:10, 75:24</p> <p><b>translating</b> [3] - 10:15, 13:12, 15:2</p> <p><b>translation</b> [48] - 4:15, 4:16, 4:19, 5:3, 6:25, 7:11, 7:13, 8:16, 8:25, 9:3, 9:15, 9:17, 9:23, 10:2, 11:6, 12:2, 12:6, 12:7, 12:18, 13:9, 13:10, 13:20, 14:3, 14:8, 14:9, 14:14, 16:8, 16:10, 16:11, 16:18, 17:2, 17:9, 17:25, 18:3, 18:7, 18:20, 19:23, 21:9, 21:11, 24:3, 24:20, 25:25, 70:6, 70:11, 75:22, 76:10, 78:3</p> <p><b>translations</b> [2] - 21:1, 64:6</p> <p><b>translator</b> [2] - 64:10,</p>	<p>76:17</p> <p><b>TRAURIG</b> [1] - 2:19</p> <p><b>tremendous</b> [1] - 51:8</p> <p><b>trial</b> [17] - 20:6, 20:8, 20:9, 20:10, 20:12, 20:16, 20:22, 21:22, 22:6, 22:8, 22:14, 22:22, 23:6, 23:11, 23:17, 23:19, 23:23</p> <p><b>tried</b> [1] - 11:23</p> <p><b>TRISCHLER</b> [29] - 2:16, 34:25, 35:2, 39:15, 39:25, 40:4, 43:6, 43:10, 43:13, 43:19, 43:23, 44:20, 50:14, 53:2, 53:4, 53:14, 55:21, 56:23, 60:9, 60:14, 60:25, 62:1, 69:23, 70:2, 77:13, 77:20, 78:3, 78:9, 78:15</p> <p><b>Trischler</b> [19] - 34:23, 35:12, 40:1, 40:2, 40:15, 46:2, 46:10, 50:7, 50:13, 52:8, 52:25, 56:24, 57:1, 61:7, 75:14, 78:7, 78:8, 79:3, 79:19</p> <p><b>Trischler's</b> [1] - 46:25</p> <p><b>trouble</b> [2] - 40:8, 42:14</p> <p><b>trove</b> [1] - 15:3</p> <p><b>try</b> [9] - 11:24, 19:11, 25:19, 41:10, 48:6, 60:22, 62:15, 68:15, 75:9</p> <p><b>trying</b> [11] - 12:10, 14:1, 23:4, 39:10, 40:23, 44:2, 50:4, 50:15, 53:24, 54:24, 72:7</p> <p><b>turn</b> [2] - 26:20, 71:19</p> <p><b>turnaround</b> [5] - 53:25, 54:13, 54:24, 55:18, 66:2</p> <p><b>turned</b> [2] - 10:7, 54:22</p> <p><b>turns</b> [1] - 30:5</p> <p><b>twice</b> [1] - 51:15</p> <p><b>two</b> [14] - 15:7, 15:10, 19:19, 21:12, 49:14, 50:23, 54:15, 55:1, 71:19, 73:24, 74:22, 75:1, 79:4</p> <p><b>two-day</b> [2] - 71:19, 74:22</p> <p><b>type</b> [1] - 73:19</p> <p><b>typically</b> [1] - 42:24</p>	<p><b>U</b></p> <p><b>U.S</b> [3] - 1:7, 2:14, 28:11</p> <p><b>ultimately</b> [1] - 25:20</p> <p><b>umpire</b> [1] - 73:17</p> <p><b>under</b> [4] - 45:16, 50:18, 54:9, 80:17</p> <p><b>underlying</b> [1] - 11:16</p> <p><b>understood</b> [4] - 25:22, 62:1, 75:3, 79:18</p> <p><b>undoubtedly</b> [1] - 55:24</p> <p><b>unfamiliar</b> [1] - 46:7</p> <p><b>unformatted</b> [1] - 11:14</p> <p><b>unfortunately</b> [2] - 46:4, 74:23</p> <p><b>UNIDENTIFIED</b> [1] - 9:9</p> <p><b>UNITED</b> [1] - 1:1</p> <p><b>United</b> [1] - 76:16</p> <p><b>unitized</b> [1] - 40:21</p> <p><b>universe</b> [2] - 27:21, 40:25</p> <p><b>unless</b> [4] - 9:15, 12:3, 33:6, 58:17</p> <p><b>unnecessarily</b> [2] - 68:13, 71:18</p> <p><b>unrelated</b> [1] - 57:17</p> <p><b>unusable</b> [1] - 12:18</p> <p><b>unusual</b> [1] - 73:5</p> <p><b>unworkable</b> [1] - 74:23</p> <p><b>up</b> [25] - 4:18, 6:7, 17:24, 19:12, 19:13, 26:8, 27:17, 36:5, 37:10, 42:19, 43:7, 43:11, 45:6, 47:2, 47:16, 48:1, 48:17, 62:15, 62:16, 68:13, 70:21, 71:16, 77:6, 77:9, 78:25</p> <p><b>upcoming</b> [2] - 49:2, 52:22</p> <p><b>upload</b> [1] - 12:13</p> <p><b>uploaded</b> [1] - 13:19</p> <p><b>USA</b> [2] - 2:21, 2:25</p> <p><b>useful</b> [1] - 56:22</p> <p><b>uses</b> [1] - 14:1</p>	<p><b>V</b></p> <p><b>valsartan</b> [13] - 38:7, 38:8, 38:12, 38:19, 39:6, 39:9, 39:14, 57:22, 58:2, 58:6, 58:9, 59:22</p> <p><b>VALSARTAN</b> [1] - 1:4</p> <p><b>Vanaskie</b> [1] - 4:2</p>	<p><b>VANASKIE</b> [115] - 1:11, 4:3, 5:9, 5:15, 5:22, 6:1, 6:9, 6:18, 6:23, 7:9, 7:25, 8:21, 9:8, 9:12, 9:21, 10:3, 10:20, 10:25, 12:8, 12:20, 13:22, 14:15, 14:22, 16:3, 18:9, 18:16, 20:4, 20:14, 20:24, 21:23, 24:1, 24:11, 25:7, 25:14, 25:24, 26:2, 26:5, 26:20, 27:4, 27:25, 28:6, 29:15, 30:2, 30:5, 31:13, 32:13, 32:20, 33:5, 33:11, 33:24, 35:1, 35:10, 35:16, 35:24, 36:2, 36:7, 36:11, 36:16, 37:12, 37:21, 37:25, 38:22, 39:3, 39:16, 40:2, 40:6, 40:9, 41:12, 42:7, 42:18, 43:4, 43:17, 43:21, 44:18, 46:1, 50:10, 52:11, 52:24, 53:3, 53:13, 56:4, 56:24, 57:5, 57:9, 58:23, 60:13, 60:24, 61:18, 62:2, 62:23, 63:14, 64:4, 64:20, 65:10, 66:3, 67:8, 67:14, 67:20, 68:12, 68:23, 69:4, 69:14, 69:18, 70:1, 71:25, 73:8, 74:12, 75:14, 76:1, 78:6, 80:2, 80:20, 80:23, 80:25, 81:4</p> <p><b>various</b> [1] - 27:11</p> <p><b>vast</b> [3] - 51:13, 55:13</p> <p><b>vendor</b> [13] - 9:2, 9:17, 9:24, 10:6, 11:4, 12:25, 13:12, 13:13, 14:1, 14:2, 16:10, 16:12</p> <p><b>vendors</b> [3] - 10:22, 11:3, 11:9</p> <p><b>version</b> [12] - 12:6, 12:13, 12:14, 19:20, 19:21, 19:24, 19:25, 21:12, 21:18, 22:15, 22:18, 22:19</p> <p><b>versions</b> [5] - 19:19, 21:12, 22:21, 26:19</p> <p><b>VIA</b> [1] - 1:6</p> <p><b>via</b> [1] - 4:1</p> <p><b>VICTORIA</b> [1] - 2:19</p> <p><b>Victoria</b> [3] - 69:17, 69:19, 69:24</p> <p><b>video</b> [1] - 74:11</p>
--	--	--	--	---	---

<p><b>videoconference</b> <sup>[1]</sup> - 4:1</p> <p><b>VIDEOCONFERENC</b> <b>E</b> <sup>[1]</sup> - 1:6</p> <p><b>videos</b> <sup>[2]</sup> - 22:13, 23:15</p> <p><b>view</b> <sup>[7]</sup> - 7:14, 13:11, 26:25, 27:7, 30:22, 34:10, 34:11</p> <p><b>viewpoints</b> <sup>[1]</sup> - 28:16</p> <p><b>violation</b> <sup>[1]</sup> - 65:8</p> <p><b>virtually</b> <sup>[2]</sup> - 55:7, 55:15</p> <p><b>volume</b> <sup>[5]</sup> - 40:13, 63:2, 63:7, 64:14, 71:20</p>	<p><b>withholding</b> <sup>[1]</sup> - 31:25</p> <p><b>witness</b> <sup>[89]</sup> - 4:20, 5:4, 8:7, 8:9, 8:10, 8:17, 11:18, 13:7, 17:6, 17:11, 17:14, 18:6, 18:22, 19:12, 19:16, 19:17, 19:21, 19:25, 21:2, 21:4, 21:10, 21:14, 21:17, 22:12, 23:2, 23:3, 23:6, 23:14, 24:4, 24:6, 24:7, 24:13, 24:18, 24:20, 24:23, 24:24, 25:9, 25:10, 25:11, 25:16, 39:8, 39:13, 51:19, 54:4, 54:8, 54:10, 64:10, 64:15, 64:17, 64:25, 65:1, 70:8, 70:10, 70:23, 71:5, 71:12, 72:2, 72:16, 72:18, 73:1, 73:3, 73:11, 73:12, 73:16, 73:21, 73:22, 73:24, 74:10, 74:14, 74:16, 75:4, 76:13, 77:2, 77:4, 77:7, 77:16, 78:10, 79:9, 80:4, 80:5, 80:12, 80:14, 80:18</p> <p><b>witness's</b> <sup>[9]</sup> - 24:7, 24:21, 24:23, 25:1, 25:4, 25:15, 25:19, 25:21, 64:13</p> <p><b>witnesses</b> <sup>[16]</sup> - 15:2, 22:13, 23:24, 24:16, 38:21, 49:2, 49:5, 49:24, 65:2, 67:16, 70:15, 71:9, 71:22, 76:8, 76:9</p> <p><b>wondering</b> <sup>[2]</sup> - 59:11</p> <p><b>word</b> <sup>[2]</sup> - 58:2, 58:8</p> <p><b>words</b> <sup>[2]</sup> - 21:1, 73:10</p> <p><b>workable</b> <sup>[2]</sup> - 50:8, 52:2</p> <p><b>works</b> <sup>[5]</sup> - 12:10, 12:16, 42:1, 63:10, 77:24</p> <p><b>world</b> <sup>[3]</sup> - 49:25, 50:3, 50:4</p> <p><b>worse</b> <sup>[1]</sup> - 10:8</p> <p><b>writing</b> <sup>[1]</sup> - 56:6</p> <p><b>written</b> <sup>[1]</sup> - 56:15</p>	<p><b>Z</b></p> <p><b>Zhejiang</b> <sup>[1]</sup> - 2:14</p> <p><b>ZHP</b> <sup>[19]</sup> - 5:1, 5:2, 6:25, 21:7, 26:4, 26:24, 27:3, 27:5, 28:4, 28:12, 29:13, 46:14, 64:12, 70:7, 71:1, 71:17, 75:1, 75:13, 75:19</p> <p><b>ZHP's</b> <sup>[1]</sup> - 28:21</p> <p><b>zone</b> <sup>[1]</sup> - 6:5</p> <p><b>ZOOM</b> <sup>[1]</sup> - 1:6</p> <p><b>Zoom</b> <sup>[4]</sup> - 4:1, 28:11, 35:13, 68:14</p>
<p><b>W</b></p> <p><b>wait</b> <sup>[2]</sup> - 6:4, 63:19</p> <p><b>WALLACK</b> <sup>[1]</sup> - 3:2</p> <p><b>wants</b> <sup>[9]</sup> - 5:13, 10:17, 66:14, 67:4, 72:2, 72:18, 73:22, 73:24, 75:7</p> <p><b>warrant</b> <sup>[2]</sup> - 29:25, 34:18</p> <p><b>warranted</b> <sup>[2]</sup> - 27:9, 51:16</p> <p><b>waste</b> <sup>[1]</sup> - 44:11</p> <p><b>weaves</b> <sup>[1]</sup> - 44:1</p> <p><b>Wednesday</b> <sup>[2]</sup> - 56:15, 56:18</p> <p><b>week</b> <sup>[8]</sup> - 6:15, 47:7, 53:18, 55:1, 62:18, 65:22, 70:5, 79:7</p> <p><b>weeks</b> <sup>[2]</sup> - 30:19, 62:14</p> <p><b>weigh</b> <sup>[1]</sup> - 61:14</p> <p><b>welcome</b> <sup>[1]</sup> - 33:16</p> <p><b>WERNER</b> <sup>[1]</sup> - 2:23</p> <p><b>whatnot</b> <sup>[1]</sup> - 41:21</p> <p><b>whipsawed</b> <sup>[2]</sup> - 19:22, 21:21</p> <p><b>WHITELEY</b> <sup>[1]</sup> - 1:19</p> <p><b>whole</b> <sup>[3]</sup> - 12:18, 15:3, 46:20</p> <p><b>wholistic</b> <sup>[1]</sup> - 41:23</p> <p><b>willing</b> <sup>[5]</sup> - 7:23, 13:9, 60:21, 73:2</p> <p><b>wish</b> <sup>[1]</sup> - 6:20</p> <p><b>wishes</b> <sup>[1]</sup> - 14:11</p> <p><b>withheld</b> <sup>[20]</sup> - 4:10, 34:2, 34:21, 40:14, 40:19, 40:24, 41:2, 41:22, 42:11, 47:15, 49:10, 52:8, 52:17, 54:13, 57:24, 58:4, 58:15, 58:21, 62:9, 63:6</p> <p><b>withhold</b> <sup>[1]</sup> - 42:4</p>	<p><b>Y</b></p> <p><b>Yang</b> <sup>[1]</sup> - 28:17</p> <p><b>year</b> <sup>[2]</sup> - 50:19, 54:7</p> <p><b>yesterday</b> <sup>[1]</sup> - 40:17</p>	